

**United States Department of the Interior  
Bureau of Land Management**

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**Decision Record  
Environmental Assessment**

**DOI-BLM-UT-Y010-2011-0189**

**December 2012**

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**Red Rock 4-Wheelers Jeep Safari and Fall Campout 10-Year  
Special Recreation Permit Renewal and Other Permitted,  
Non-Competitive Motorized Use of Jeep Safari Routes**

***Location: Grand and San Juan Counties, Utah***

***Applicant/Address: Red Rock 4-Wheelers, Moab, Utah 84532 (for Jeep Safari)  
Moab BLM (for other permitted users)***

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Moab Field Office  
82 East Dogwood  
Moab, Utah 84532  
Phone: 435-259-2100  
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**Red Rock 4-Wheelers Jeep Safari and Fall Campout 10-Year  
Special Recreation Permit Renewal and Other Permitted,  
Non-Competitive Motorized Use of Jeep Safari Routes**

It is my decision to renew the Red Rock 4-Wheelers Jeep Safari and Fall Campout Special Recreation Permit for a period of ten years. In addition, this decision authorizes permitted motorized use on 782 miles of designated route for the Red Rock 4-Wheelers as well as for other permitted, non-competitive motorized users. The 782 miles of route are depicted in maps attached to the EA, as well as described in tabular form. The Day Canyon Point and Deadman Point routes are approved for permitted use by the Red Rock 4-Wheelers only. All other routes listed in the EA are approved for use by all motorized permitted users.

The routes are authorized for Special Recreation Permit use under the authority of the Federal regulations at 43 CFR 2930. Exclusive use on seven routes on days on which Jeep Safari occurs is also approved as part of the permit (Behind the Rocks, Cliffhanger, Gold Bar Rim, Rusty Nail/Where Eagles Dare/Golden Spike, Moab Rim, Poison Spider and Pritchett Canyon). One way use for the entire nine-day Jeep Safari is also approved for Kane Creek Canyon, Hell's Revenge and Steelbender.

Potential resource impacts resulting from the SRPs are mitigated through environmental commitments or design features incorporated into the Proposed Action of the EA. These design features (stipulations) are included as conditions of approval to this decision and are provided in Attachment A. The stipulations attached to the Red Rock 4-Wheelers' Special Recreation Permit will also be attached to all permits issued to motorized commercial users and event promoters. These stipulations require all permitted users to adhere to design features that mitigate the impacts of their use. These stipulations are applicant-committed measures and are attached as Appendix A to the Environmental Assessment.

Compliance monitoring will be undertaken by BLM staff for all permitted motorized events for compliance with stipulations. Commercial motorized tour operators will also be monitored for compliance with stipulations. Monitoring would include accompanying or encountering permitted trips. Compliance monitoring may also include unannounced accompaniments.

**PLAN CONFORMANCE AND CONSISTENCY:**

The decision is in conformance with the 2008 Moab RMP, approved in October of 2008 as required by the regulations at 43 CFR 1610.5.

Conformance with the 2008 Moab RMP is shown in the following decisions:

REC-46 (page 97): Special Recreation Permits (SRPs): SRPs are issued as a discretionary action as a means to help meet management objectives, provide opportunities for economic activity, facilitate recreational use of the public lands, control visitor use, protect recreational and natural resources, and provide for the health and safety of visitors. Cost recovery procedures for issuing SRPs will be applied where appropriate.

REC-48 (page 98): All SRPs will contain standard stipulations appropriate for the type of activity and may include additional stipulations necessary to protect lands or resources, reduce user conflicts, or minimize health and safety concerns.

REC-50 (page 97): Issue and manage SRPs for a wide variety of uses to enhance outdoor recreational opportunities, provide opportunities for private enterprise, manager user-group interaction, and limit the impacts of such uses upon natural and cultural resources. Organized group permits required for groups with 25 or more vehicles.

TRV-11 (page 127): Designated routes – motorized: designate 3,693 miles of motorized routes (all proposed routes in this EA are designated in the RMP)

The decision is in compliance with the Federal Land Policy Management Act (FLPMA), and all other applicable statutes and regulations.

In addition, the decision is consistent with the Master Plans for both Grand and San Juan counties, as outlined below.

Grand County's General Plan Update states that Grand County encourages the expeditious processing of use permits for economic uses of public lands. Furthermore, the Grand County General Plan Update further states that Grand County will be involved with public land managers with new and ongoing events and promote cooperation with the permitting process. The Grand County General Plan Update also recognizes the positive economic impacts of recreation tourism on the Grand County economy.

San Juan County's Master Plan (July, 1996) identifies recreation and tourism as an economic opportunity. The plan calls for working to promote recreation and tourism within the county.

**Alternatives Considered:** Only the No Action alternative was considered. All routes requested for permitted use were designated for motorized use in the 2008 Moab RMP, and the impacts of designating these routes was considered in the Environmental Impact Statement accompanying that document. All of the requested routes are available to the general public on a daily basis. Permitted users are required to adhere to the stipulations that are part of the proposed action. These stipulations address many of the issues raised during scoping. Therefore, there were no issues remaining that drove the development of another action alternative.

One alternative (to exclude designated routes within the America's Red Rock Wilderness Act) was considered but eliminated from further analysis. The areas in question have been inventoried and evaluated for wilderness characteristics as part of the development of the Moab RMP. Although a subset of America's Red Rock Wilderness lands are deemed by BLM to possess wilderness characteristics, none of the lands in question are managed to protect, preserve

or maintain their wilderness characteristics. Lands that BLM has deemed to possess wilderness characteristics are analyzed in the EA.

Routes designated in the RMP within the lands in America's Red Rock Wilderness Act are available for motorized travel to the general public. The OHV regulations at 43 CFR 8340 allow the operation of vehicles on those routes designated as open to motorized use. It is not reasonable to disallow the use of designated routes to permitted users only.

**Rationale for Decision:** The decision is to authorize permitted, motorized, non-competitive use on 782 miles of route designated in the Travel Plan accompanying the Moab RMP. (The Deadman Point and Day Canyon Point are authorized for the Red Rock 4-Wheelers' permit only). Choosing the proposed action will provide recreation opportunities to the public as well as an economic benefit to Grand County. No other action alternatives were carried forward because no issues remained to be resolved, since stipulations attached to the permit addressed impacts.

The decision conforms to the 2008 Moab Resource Management Plan and its Travel Plan. Impacts resulting from designating the routes in question are detailed in the Environmental Impact Statement accompanying the RMP.

The Project Description was posted on the Environmental Notification Bulletin Board on June 1, 2011. The public was given an opportunity to raise issues during the formal scoping period, which was held from May 24 to June 25, 2012. An article in the *Moab Times Independent* (May 24, 2012) asked the public for scoping comments on the proposal. Fifty-six persons scoping comments were received during the scoping period; of the responses, 54 persons supported the issuance of the permit and addressed issues such as economic benefit. Two persons discussed negative impacts that they felt resulted from the issuance of the permit. One organization also submitted scoping comments.

A public comment period on the Environmental Assessment was held from October 26, 2012 to November 30, 2012. This period was announced on the ENBB as well as in newspaper articles in the *Moab Times Independent* on October 25, 2012, in the *Moab Sun News* on October 31, 2012, and in the *San Juan Record* on October 31, 2012. There were 527 people and two organizations that commented on the proposed action. Of these comments, 456 were identical comments generated by a posting on the Southern Utah Wilderness Alliance webpage. These comments asked that Jeep Safari routes not be approved in lands proposed for wilderness in America's Red Rock Wilderness Bill. Six private individuals commented with various degrees of opposition to issuing the permit; some of these commenters objected only to adding new routes to the permit. Two organizations, the Canyonlands Watershed Council and the Southern Utah Wilderness Alliance, provided comments on the EA. The Canyonlands Watershed Council also stated that it supported those comments made by the Southern Utah Wilderness Council.

There were 65 private comments in support of issuing the permit; these commenters concentrated on the benefits derived from holding the event.

The BLM's response to comments resulted in small changes to the EA. These changes are displayed in the attached EA by being shown in grayscale. A summary of the comments and the BLM's responses to them is provided in Appendix G of the EA.



Public concerns were raised about the potential effects from vehicle travel on roads within America's Red Rock Wilderness Act and about several routes adjacent to riparian areas. Several commenters objected to adding designated routes to the list of routes authorized for permitted use. One organization raised issues concerning cultural resources and air quality degradation resulting from the event. Conversely, other commenters discussed the economic and recreation benefits derived from issuing motorized permits on designated roads.

**Appeals Language:**

This decision to issue the Jeep Safari permit is effective upon the date it is signed by the authorized officer (December 28, 2012). As stated in the regulations for recreation permits at (43 CFR 2931.8 (b), the provisions of 43 CFR Subpart B 4.21(a) do not apply, and the decision shall remain effective pending appeal unless a stay is granted under Section 4.21(b).

Any appeal of this decision must follow the procedures set forth in 43 CFR Parts 4 and 1840. Thus, within 30 days of the decision, a notice of appeal must be filed in the Moab Field Office, 82 East Dogwood, Moab, Utah 84532. If a statement of reasons for the appeal is not included with the notice, it must be filed with the Interior Board of Land Appeals, Office of Hearings and Appeals, U.S. Department of the Interior, 801 North Quincy St., Suite 300, Arlington, VA 22203 within 30 days after the notice of appeal is filed with the authorized officer.

If you wish to file a petition for stay pursuant to 43 CFR Part 4.21(b), the petition for stay should accompany your notice of appeal and shall show sufficient justification based on the following standards:

- (1) The relative harm to the parties if the stay is granted or denied,
- (2) The likelihood of the appellant's success on the merits,
- (3) The likelihood of irreparable harm to the appellant or resources if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.

If a petition for stay is submitted with the notice of appeal, a copy of the notice of appeal and petition for stay must be served on each party named in the decision from which the appeal is taken, and with the IBLA at the same time it is filed with the authorized officer.

A copy of the notice of appeal, any statement of reasons and all pertinent documents must be served on each adverse party named in the decision from which the appeal is taken and the Office of the Regional Solicitor, U.S. Department of the Interior, 6201 Federal Building, 125 South State Street, Salt Lake City, Utah 84138-1180, not later than 15 days after filing the document with the authorized officer and/or IBLA.

  
\_\_\_\_\_  
Authorized Officer

12/28/12  
\_\_\_\_\_  
Date

**Attachments: EA # DOI-BLM-UT-Y010-2011-0189**  
**Stipulations Attached to all Motorized Permits**



## **Attachment A for Decision Record**

### **UNITED STATES DEPARTMENT OF THE INTERIOR**

#### **BUREAU OF LAND MANAGEMENT, MOAB FIELD OFFICE**

#### **SPECIAL RECREATION PERMIT STIPULATIONS for MOTORIZED USE**

##### **BLM National Terms and Stipulations**

- a. The permittee shall comply with all Federal, State, and local laws, ordinances, regulations, orders, postings, or written requirements applicable to the area or operations covered by the Special Recreation Permit. The permittee shall ensure that all persons operating under the authorization have obtained all required Federal, State, and local licenses or registrations. The permittee shall make every reasonable effort to ensure compliance with these requirements by all agents of the permittee and by all clients, customers, participants, or spectators under the permittee's supervision.
- b. A Special Recreation Permit authorizes special uses of the public lands and related waters as specified in the permit. Should circumstances warrant, the permit may be modified by the BLM at any time, including modification of the amount of use. The authorized officer may suspend or terminate a SRP if necessary to protect public resources, health, safety, the environment, or because of noncompliance with permit stipulations. Failure to comply may result in criminal, civil, and/or administrative actions (probation, suspension, cancellation). Administrative actions by the BLM to suspend or terminate a SRP may be appealed.
- c. No value shall be assigned to or claimed for the permit, or for the occupancy or use of Federal lands or related waters granted thereupon. The permit privileges are not to be considered property on which the permittee shall be entitled to earn or receive any return, income, price, or compensation. The use of a permit as collateral is not recognized by the BLM.
- d. Unless expressly stated, the SRP does not create an exclusive right of use of an area by the permittee. The permittee shall not interfere with other valid uses of the Federal land by other users. The United States reserves the right to use any part of the area for any purpose.
- e. The permittee or permittee's representative may not assign, contract, or sublease any portion of the permit authorization or interest therein, directly or indirectly, voluntarily or involuntarily. However, the authorized officer may approve contracting of equipment or services in advance, if necessary to supplement a permittee's operations. Such contracting should not constitute more than half the required equipment or services for any one trip and the permittee must retain operational control of the permitted activity. If equipment or services are contracted, the permittee shall continue to be responsible for compliance with all stipulations and conditions of the permit.

f. All advertising and representations made to the public and the authorized officer must be accurate. Although the addresses and telephone numbers of the BLM may be included in advertising materials, official agency symbols may not be used. The permittee shall not use advertising that attempts to portray or represent the activities as being conducted by the BLM. The permittee may not portray or represent the permit fee as a special Federal users' tax. The permittee must furnish the authorized officer with any current brochure and price list if requested by the authorized officer.

g. The permittee must assume responsibility for inspecting the permitted area for any existing or new hazardous conditions, e.g., route conditions, abandoned mines, landslides, avalanches, rocks, changing water or weather conditions, falling limbs or trees, submerged objects, hazardous wildlife, or other hazards that present risks for which the permittee assumes responsibility.

h. In the event of default on any mortgage or other indebtedness, such as bankruptcy, creditors shall not succeed to the operating rights or privileges of the permittee's SRP.

i. The permittee cannot, unless specifically authorized, erect, construct, or place any building, structure, or other fixture on public lands. Upon leaving, the lands must be restored as nearly as possible to pre-existing conditions.

j. The permittee, or a representative thereof, must present or display a copy of the Special Recreation Permit to an authorized officer's representative, or law enforcement personnel upon request. If required, the permittee, or a representative thereof, must display a copy of the permit or other identification tag on equipment used during the period of authorized use.

k. The authorized officer, or other duly authorized representative of the BLM, may examine any of the records or other documents related to the permit, the permittee or the permittee's operator, employee, or agent for up to 3 years after expiration of the permit.

l. The permittee shall notify the authorized officer of any accident which occurs while involved in activities authorized by this permit which results in: death, personal injury requiring hospitalization or emergency evacuation, or in property damage greater than \$2,500 (lesser amounts if established by State law). Reports should be submitted within 24 hours in the case of death or injury, or 10 days in accidents involving property damage.

## **BLM Utah Terms and Stipulations**

### **A. General**

(1) Permits issued for more than one year are subject to annual validation. To secure validation the permit holder must:

(a) have performed satisfactorily under the terms and conditions of this permit and be in conformance with applicable Federal, State, and local laws, ordinances, regulations,

orders, postings, and written requirements applicable to the area and operation covered by the permit,

(b) ensure that all persons operating under the permit have obtained all required Federal, State, and local licenses or registrations,

(c) have on file, with the office issuing the permit, current insurance identifying the U.S. Government as additional insured as specified in stipulation C, and

(d) have no outstanding, past due, or unpaid billing notices.

(2) Permittees may not leave unattended personal property on public lands administered by the Bureau of Land Management for a period of more than 48 hours without written permission of the authorized officer, with the exception that vehicles may be parked in designated parking areas for up to 14 consecutive days. Unattended personal property is subject to disposition under the Federal Property and Administrative Services Act of 1949 as amended.

(3) The permit only authorizes the use for the activity, the time(s) and in the area(s) specifically described above.

(4) The permittee must maintain on file with the BLM a current and correct list of employees who will be conducting services for the company on public land. Persons providing services under this permit must be an employee of the permittee.

(5) Placement of caches of supplies and food or equipment for future trips is not allowed unless specifically authorized.

(6) The permittee must allow BLM representatives to complete permit checks to determine the validity of the permit, ascertain the group has a copy of the permit, all required equipment, and to orient trip participants about the use of public lands and safety.

#### B. Financial

(1) All fees associated with commercial use are established by the Director, updated every three years based on the Implicit Price Deflator Index, and published in the Federal Register. Commercial use fees are based on a percentage (3% as of February, 2007) of the adjusted gross revenue derived from use authorized under the Special Recreation Permit. The minimum, non-refundable use fee is \$100.

(2) A prepayment of estimated use fees is due prior to use occurring. This amount is based on either the amount of fees paid the previous year or an annual revenue estimate agreed to by both the permittee and the authorized officer. Periodic payments are allowed if the prepayment amount due exceeds \$1,000. At least 25% of the total amount due must be paid prior to use.

(3) The permittee must submit a post use report (see attachment) thirty days after the last use of the permit in a calendar year, or as agreed upon with the field office administering the permit.

Alternative reporting arrangements may be established by written agreement with the authorized officer. An extension of this due date may be approved by the issuing office on a case-by-case basis. The report must contain a trip-by-trip log of: trip location, beginning and ending dates of each trip, number of clients, number of guides, and gross receipts for the trip. In reporting gross receipts, the outfitter will report all payments made by the customer, including trip-related equipment rental, with the only exception being retail sales of durable goods that remain the property of the customer and have an expected service life extending beyond the guided activity. Sales tax associated with gross receipts is exempt from reporting requirements. The request for deductions based on pre- and post- trip transportation and lodging expenses and percentage of time on public land, if being claimed, must also be submitted at this time. Requests for transportation and lodging deductions must be accompanied by copies of supporting receipts documenting proof of payment.

(4) The permittee must submit a Post Use Report to the authorized officer for every year the permit is in effect. If the post use report is not received by the established deadline (see Special Recreation Permit Details on page one) the following late fee schedule will be initiated:

- More than 15 days but less than 30 days after the due date: \$125
- More than 30 days after the due date, but less than 45 days: \$250

Post use reports submitted more than 45 days after the due date may result in criminal, civil, and/or administrative action to protect the interest of the United States.

(5) The permittee must maintain the following internal accounting records pertaining to the permit:

- (a) W-2 records or a similar record of employment for all employees conducting trips under the permit,
- (b) a record of all financial relationships with booking agents or advertisers,
- (c) a record of all receipts or compensation including payments, gratuities, donations, gifts, bartering, etc., received from any source on trips conducted under the permit, and
- (d) a record of all payments made by the permittee and claimed as a deduction in the permittee's fee submission.

The BLM retains the right to verify permit compliance from the books, correspondence, memoranda, and other records of the permittee, and from the records pertaining thereto of a proprietary or affiliated company during the period of the permit and for three years thereafter regardless of physical location.

#### C. Insurance

(1) At a minimum, the permittee shall have in force public liability insurance in the appropriate amount as indicated in Special Recreation Permit Details on page one.

#### General Guidelines for Minimum Insurance Requirements

SRP Event or Activity	Per Occurrence	Per Annual Aggregate
Low Risk: general non-competitive and non-commercial activities such as group camping, group activities, mounted orienteering, backpacking, or dog trials.	\$300,000	\$600,000
Moderate Risk: whitewater boating, horse endurance rides, OHV events, mountain bike races, rock climbing (with ropes), ultra-light outings, rodeos	\$500,000	\$1,000,000
High Risk: bungee jumping, speed record events, unaided rock climbing	\$1,000,000	\$2,000,000 - \$10,000,000

(2) The policy shall state that the insurance company shall have no right of subornation against the United States of America.

(3) Such insurance must name the United States Department of the Interior - BLM as additional insured and provide for specific coverage of the permittee's contractually assumed obligation to indemnify the United States.

(4) The policy shall stipulate that the authorized officer of the Bureau of Land Management shall be notified 30 days in advance of the termination or modification of the policy.

(5) The permit is not valid unless the permittee maintains a current authenticated certificate of the required insurance on file with the office issuing the permit.

(6) The permittee shall indemnify and hold harmless the United States against any responsibility or liability for damage, death, injury, or loss to persons and property which may occur during the permitted use period or as a result of such use.

(7) The permittee shall furnish a copy of the insurance policy directly to the authorized officer.

(8) The name of the insured on the insurance policy must be the same as the name on the permit. Those permittees holding insurance policies which only insure the permittee and not the permittee's employees must ensure that their employees also have the required insurance in effect, and that a certificate of insurance is furnished to the authorized officer.

(9) For multi-year permits, the insurance policy must be provided the first year, but on each subsequent year the authorized officer may accept a valid certificate of insurance.

(10) The insurance need only be valid during periods of actual use.

#### D. Marking of Outfitter Vehicles

Every street-legal motor vehicle used to transport clients or equipment shall be marked with at least one sign, decal, or placard on each side of the vehicle. The sign shall at a minimum include the company name and the city and state where the permittee is headquartered. Information must be readable from a distance of 50 feet.

#### E. Pre-Trip Itinerary

If required, the permittee will file a notice of intent in writing with the BLM prior to each trip. The notice of intent must specify the intended dates of the trip, number of clients, number of guides, name of the lead guide and area to be visited, including the location of camps. See Special Recreation Permit Details on page one for itinerary requirements for this permit.

#### F. Environmental and Resource Protection

All trips must conform to *Leave No Trace* principles.

(1) For all trips and at all base camps with locations served by a motorized vehicle, the permittee must have a toilet system that allows for the proper carry-out and disposal of solid human body waste that is adequate for the size of the group and length of the trip. Toilets must be accessible for use by passengers and crew at all sites where a company motorized vehicle is present, except in developed locations where public restrooms are provided. In locations remote from a permittee's vehicle, solid human waste must be cat holed in a sunny location in bare soil or carried out (unless otherwise stipulated). Toilet paper must be carried out and not buried or burned.

(2) Cans, rubbish, and other trash shall not be discarded, buried, or dumped on public lands or related waters. Wet garbage such as egg shells, orange peels, leftover solid food, bones, melon rinds, etc., must be carried out. Trash cleanup at campsites and day use areas will include all litter or discarded items including small items such as bottle caps and cigarette butts.

(3) Washing or bathing with soap is not permitted in tributary streams, springs or other natural water sources. Dishwater must be strained prior to dispersal. Dishwater and bathwater may not be dumped within 100 feet of streams, springs, or other natural water sources. Only biodegradable soap may be used.

(4) The permittee will be responsible to ensure that historical, archaeological, cultural, or ecological values are not damaged, destroyed, or removed by any participants on authorized trips. Unless specifically authorized, collection of plants, rocks, fossils, artifacts, shed antlers, animals or parts of animals is prohibited. Permits for such collecting are issued separately outside of this Special Recreation Permit.

(5) The permittee must conduct operations authorized by the permit in accordance with applicable BLM management plans and the permittee's own operating plan submitted to the BLM in support of this permit.

(6) The number of participants on any trip, including guides, may not exceed the number specified in the permittee's operating plan and approved permit. The exception to this requirement is over-the-road bus tours using state and Federal highway and class B county roads.

(7) No camping is permitted within 300 feet of a known prehistoric or historic site.

(8) No camping is permitted within 300 feet of a water source other than perennial streams unless prior authorization is received from the authorizing officer.

#### G. Fires

This permit does not waive any applicable restrictions that may affect the use of camp fires or cooking fires. The following stipulations apply unless specifically waived by the Authorized Officer:



- (1) At sites accessed by the permittee's motor vehicle(s), the permittee must provide their own fuel wood.
- (2) At sites accessed by the permittee's motor vehicle, the permittee must use a fire pan to contain the fires, ash, and charcoal. Charcoal and ash from the fire pan must be hauled out.
- (3) Gathering wood from standing trees, live or dead, is prohibited.
- (4) Use of dead and down wood is permitted only at backcountry sites not accessed by the permittee's motor vehicle. In such cases, if a fire pan is not used, burn all wood to ash and naturalize the area before leaving.
- (5) Scatter fuel wood piles before leaving the site.
- (6) Comply with all fire restrictions and orders.

#### H. Safety and Equipment

- (1) The permittee shall provide the equipment necessary to serve the public in a safe manner. The permittee will ensure that trips are conducted in compliance with all laws and regulations relating to vehicle operations, land use restrictions, food handling, and any other applicable regulations.
- (2) Every person serving as a guide on public land must at a minimum be trained and currently certified in Basic First Aid and Cardio-pulmonary Resuscitation (CPR). Each guide must have legible copies of certification cards in his/her possession while operating under a BLM Special Recreation Permit in Utah. In addition, certification cards must be filed at the permittee's headquarters and available for BLM review if necessary.
- (3) The following equipment must be carried on all commercial trips:
  - (a) A first aid kit adequate to accommodate each activity, group, or subgroup will be carried on all trips.
  - (b) Adequate repair kits and spare supplies appropriate for the trip and activity.
- (4) The following procedures must be followed on all commercial trips:
  - (a) Unless specifically authorized in the permit, discharge of firearms is allowed only for legal pursuit of game animals by a licensed hunter.
  - (b) Use of explosives and fireworks is prohibited.

#### **SUPPLEMENTAL STIPULATIONS FOR PERMITTED USE OF JEEP SAFARI ROUTES**

- (1) The authorized officer reserves the right to limit activity and group size should it become apparent that, during the term of this permit, the use is adversely impacting on the environment. The authorized officer reserves the right to close or reroute routes that have been determined to negatively impact populations of bighorn sheep or peregrine falcon nesting sites or other endangered species.
- (2) All vehicle use will be in accordance with State law and BLM off-road vehicle designations. Vehicles must stay only on routes authorized by the Special Recreation Permit. Vehicle use is not authorized in Wilderness Study Areas. No off-route travel would be permitted. To avoid damaging cultural sites that may be near the routes, the roadbed should not be widened by inappropriate passing or parking.
- (3) Permittee will be responsible for any wildfires caused by the permittee's party and will report all wildfires to the nearest BLM Field Office.

- (4) Natural disasters and uncontrollable acts present risk which the permittee assumes. The permittee has the responsibility of inspecting the camp site and immediate adjoining area for dangerous trees, hanging limbs, and other evidence of hazardous conditions and locating his camp site to avoid such hazard.
- (5) The permittee agrees to assume responsibility for public safety and health during any phase of his operation, including first aid, retrieval and evacuation activities including costs.
- (6) All refuse will be packed out and deposited in an authorized dump site.
- (7) All guides will be informed of permit stipulations. There will be a required review of stipulations of all drivers authorized under the permit.
- (8) Permittee shall not have exclusive use of recreation areas or interfere with other valid use of the public lands unless specifically authorized under the terms of the Special Recreation Permit.
- (9) All animals will be kept under control. When outside of vehicles, all domestic animals must be kept on a leash. Domestic animals must remain in the vehicle in the presence of wildlife. Harassing of wildlife and/or livestock will not be allowed.
- (10) Any paleontological and/or cultural resources (historic or prehistoric site or object) are protected and shall not be damaged or removed. All personnel associated with the permitted activity will be informed by the permittee that they are subject to prosecution for vandalizing and/or collecting any historic or prehistoric artifacts or paleontological remains. All guides will be specifically instructed in proper cultural site visitation behavior.
- (11) Any additional routes or campsites will require additional approval from BLM.
- (12) Parking and staging will be only on non-vegetated areas; parking will occur in single file along the side of the route.
- (13) Top of the World route participants will not park off the Onion Creek Road to protect the federally listed threatened plant *Cycladenia humilis* var. *jonesii*. All travel on the Onion Creek Road will be on the county-maintained road. There is no travel in the stream or in the "Narrows."
- (14) The maximum number of vehicles allowed per route per trip is as follows. No more than 25 vehicles are allowed on Dolores Triangle, and Lockhart Basin. No more than 35 vehicles are allowed on Crystal Geyser and Pritchett Canyon. No more than 40 vehicles are allowed on Kane Creek Canyon, Rose Garden Hill, Day Canyon Point (for Jeep Safari only), Hook and Ladder/Cameo Cliffs routes and Steel Bender. No more than 45 vehicles are allowed on Golden Spike, Porcupine Rim, and Secret Spire. No more than 50 vehicles are allowed on Chicken Corners, Deadman Point (Jeep Safari only), Dome Plateau, Fisher Valley, Gold Bar Rim, Hell Roaring Rim, Hey Joe, Metal Masher, Moab Rim, Photographer's Run, Sevenmile Rim, Top of the World and Wipeout Hill. No more than 55 vehicles are allowed on Cliffhanger, Copper Ridge, and Strike Ravine. No more than 60 vehicles are allowed on 3-D, Behind the Rocks, Fins and Things, Flat Iron Mesa, Hell's Revenge, and Poison Spider.

### **Wildlife Stipulations**

- (1) The permittee will be responsible for ensuring that all guides and/or group leaders will be educated about the threatened and endangered species that could be present in the activity area. This education will include the potential penalties for taking a species listed under the Endangered Species Act. See attached Threatened and Endangered Species information sheet.

- (2) Observe desert bighorn sheep, American pronghorn, deer, and elk from a distance. No vehicle or foot pursuit allowed. No excessive noise.
- (3) In desert bighorn lambing areas (see attached map) on portions of Crystal Geyser, Day Point, Deadman Point, Gold Bar Rim, Hellroaring Rim, Hey Joe, Metal Masher, Secret Spire and Sevenmile Rim, vehicles may not stop from April 1 to June 15. No foot travel, staging or camping will occur in these areas. Noise will be kept to a minimum.
- (4) Observe low speed to avoid direct fatality of prairie dogs.
- (5) Groups must avoid disturbing raptors year-round, especially during nesting seasons (March 1-August 31). There will be no stopping within ¼ mile of active raptor nests (indicated by fresh excrement and/or defensive bird behavior). An active nest site should be reported to the appropriate BLM field office.
- (6) There will be no vehicle or foot pursuit of bald or golden eagles, ferruginous hawks, or burrowing owls. No excessive noise is allowed in the presence of these birds.
- (7) If Mexican spotted owl occupancy is determined within 0.5 miles, travel shall be suspended from March 1 to August 31 while nesting birds are in the area. There will be no pursuit or excessive noise in their presence.
- (8) If Southwestern willow flycatcher breeding/nesting territories are identified along or within 0.25 miles of authorized routes, travel and camping shall be suspended within 0.25 miles of these locations from May 1 to August 15.
- (9) No camping or staging in occupied Gunnison Sage-grouse habitat. Note: there is currently no occupied habitat along Jeep Safari routes.
- (10) To avoid degradation to habitat of endangered fish, all trips on Arch Canyon, Kane Creek Canyon, Hey Joe, Crystal Geyser, Dolores Triangle, Dome Plateau, Moab Rim, Pritchett Canyon, Top of the World, and Long Canyon will have proper clean up supplies to safely clean up and prevent further contamination of the rivers from vehicle fluids. Spills in dry drainages must also be contained and removed.
- (11) Should future inventory or monitoring for sage grouse identify occupied areas, there will be no dispersed camping within these areas.
- (12) No dispersed camping will be allowed within ½ mile of wildlife water sources.

### **Riparian/Water Quality Conservation Stipulations**

- (1) Vehicles must avoid damage to riparian vegetation and streambanks. No route widening is permitted.
- (2) When the designated route crosses a stream, vehicles must cross in a narrow single file. The single file of vehicles must all cross in the same location to avoid widening the route.
- (3) On designated routes located within streams and floodplains, e.g., Tusher Canyon (Sevenmile Rim), Kane Creek Canyon, Pritchett Canyon, vehicles must drive in the center of the stream channel, avoiding bank and vegetation disturbance.
- (4) No vehicles wider than 76 inches are permitted in the 2.4 mile section of Tusher Canyon on the Sevenmile Rim route.
- (5) If an oncoming vehicle is encountered in a narrow section of a route, vehicles will not pass each other at this point. One vehicle will reverse to a suitable, passable location.
- (6) The 3.6 mile portion of 3-D in Tusher/Bartlett Wash (just west of Highway 191) is not available for motorized use.
- (7) The unmaintained portion of the Kane Creek route will be marked annually prior to Jeep Safari week.

(8) The Dolores River crossing will not be attempted if the flow of the Dolores River exceeds 200 cubic feet per second.

**One Way and Exclusive Use Stipulations**

(1) The following routes will be one way for the entire 9 days of the Jeep Safari Event: Kane Creek Canyon, Hell's Revenge, and Steel Bender. It is the responsibility of the Red Rock 4-Wheelers to clearly sign and implement these routes as one way for the length of the Safari.

(2) BLM permittees will have exclusive motorized use of the following routes when a Jeep Safari "run" is scheduled: Behind the Rocks, Cliffhanger, Gold Bar Rim, Rusty Nail/Where Eagles Dare, Golden Spike, Moab Rim, Poison Spider, and Pritchett Canyon. For example, if a Jeep Safari run is scheduled on Behind the Rocks on April 7, only Jeep Safari and other permittees can engage in motorized travel on this route on that date.

**United States Department of the Interior  
Bureau of Land Management**

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**Finding of No Significant Impact**

**Environmental Assessment  
DOI-BLM-UT-Y010-2011-0189**

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**December 2012**

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**Red Rock 4-Wheelers Jeep Safari and Fall Campout 10-Year  
Special Recreation Permit Renewal and Other Permitted,  
Non-Competitive Motorized Use of Jeep Safari Routes**

***Location: Grand and San Juan Counties, Utah***

***Applicant/Address: Red Rock 4-Wheelers, Moab, Utah 84532 (for Jeep Safari)  
Moab BLM (for other permitted users)***

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82 East Dogwood  
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# **FINDING OF NO SIGNIFICANT IMPACT**

## **Environmental Assessment DOI-BLM-UT-Y010-2011-0189**

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### **Red Rock 4-Wheelers Jeep Safari and Fall Campout 10-Year Special Recreation Permit Renewal and Other Permitted, Non-Competitive Motorized Use of Jeep Safari Routes**

#### **INTRODUCTION:**

The Bureau of Land Management (BLM) has conducted an environmental analysis (DOI-BLM-UT-Y010-2011-0189) for a proposed action to address the Red Rock 4-Wheelers' application for a permit to conduct motorized tours (the Jeep Safari) on designated routes in Grand and San Juan counties. In addition, all other permitted, non-competitive motorized use of Jeep Safari routes is analyzed in this EA. The project would authorize the permitted use of 782 miles of already designated routes for use by Special Recreation Permit holders, including the Red Rock 4-Wheelers. (The Deadman Point route and the Day Canyon Point route would be permitted for Jeep Safari use only). The underlying need for the proposal would be met while accomplishing the objective of issuing Special Recreation Permits for motorized use under the regulations at 43 CFR 2930.

The 782 miles of designated route that are authorized for use by motorized Special Recreation Permit holders were designated for motorized use as part of the Travel Plan accompanying the 2008 Moab Resource Management Plan. This Travel Plan authorized motorized use on 3,693 miles of designated route in the Moab Field Office. EA#DOI-BLM-UT-Y010-2011-0189 is attached and is incorporated by reference for this Finding of No Significant Impact (FONSI). A no action alternative and one action alternative were analyzed in the EA.

#### **FINDING OF NO SIGNIFICANT IMPACT**

Based upon a review of the EA and the supporting documents, I have determined that the project is not a major federal action and will not significantly affect the quality of the human environment, individually or cumulatively with other actions in the general area. No environmental effects meet the definition of significance in context or intensity as defined in 40 CFR 1508.27 and do not exceed those effects described in the 2008 Moab RMP/FEIS. Therefore, an environmental impact statement is not needed.

This finding is based on the context and intensity of the project as described:

**Context:** The project is a site-specific action authorizing permitted motorized Special Recreation Permit use on 782 miles of the 3,693 miles of route designated for general motorized use in the Moab Field Office.

**Intensity:** The following discussion is organized around the Ten Significance Criteria described in 40 CFR 1508.27 and incorporated into resources and issues considered (includes supplemental

authorities Appendix 1 H-1790-1) and supplemental Instruction Memorandum, Acts, regulations and Executive Orders.

The following have been considered in evaluating intensity for this proposal:

1. **Impacts may be both beneficial and adverse.** The proposed action would impact resources as described in the EA. Mitigating measures to reduce impacts to wildlife (as well as other resources) were incorporated in the design of the action alternatives. The proposed action also benefits motorized users by allowing them to take a tour with a motorized outfitter or event manager. Impacts to resources (including wilderness characteristics) associated with the designation of the route were analyzed in the 2008 Moab RMP. The proposed action allows the permitted motorized use of these designated routes by Special Recreation Permit holders. None of the environmental effects discussed in detail in the EA and associated appendices are considered significant, nor do the effects exceed those described in the 2008 Moab RMP/FEIS.
2. **The degree to which the selected alternative will affect public health or safety.** The proposed action is designed to allow Special Recreation Permit holders to travel on previously-designated routes in the Moab Field Office. This would not add to any effects on public health or safety.
3. **Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farm lands, wetlands, wilderness, wild and scenic rivers, or ecologically critical areas.**

The 782 miles of designated linear route lie adjacent to cultural resources as well as to Wilderness Study Areas. The SHPO has concurred that permitted use of these designated routes has “No Potential to Adversely Affect” cultural resources, including those eligible for listing on the National Register of Historic Places. Six Jeep Safari routes form the boundary of Wilderness Study Areas. The requirement to stay on the road mitigates any potential impacts to the Wilderness Study Areas.

The following Critical Elements of the Human Environment and Other Resource Issues are not affected because they are not present on the designated routes which comprise the project area: Natural Areas, Wilderness Study Areas, Threatened and Endangered Plants, Geology and Paleontology. In addition, the following Critical Elements of the Human Environment and Other Resource Issues, although present, would not be affected by this proposed action for the reasons listed in Appendix B of the EA (Air Quality, Floodplains, Invasive Species, Lands, Woodlands, Vegetation, Rangeland Health Standards, Livestock Grazing, Environmental Justice, Native American Concerns, Cultural Resources, Visual Resources, Areas of Critical Environmental Concern, Water Resources, Soils, Wild and Scenic Rivers). The following Critical Elements of the Human Environment and Other Resource Issues were analyzed in detail in Chapter 4: Threatened, Endangered or Candidate Animal Species, Migratory Birds, Utah BLM Sensitive Species, Fish and Wildlife, Riparian, Wilderness Characteristics, Socioeconomics and Recreation. None of these would be significantly impacted because mitigating measures and the resultant stipulations are sufficient to minimize potential impacts.

4. **The degree to which the effects on the quality of the human environment are likely to be highly controversial.** There is nothing in this proposal that is scientifically controversial. The environmental effects of issuing permits for motorized use on previously-designated routes are well understood and there is no controversy over the nature of the impacts, particularly because of the measures that will be employed to minimize environmental effects on designated routes.
5. **The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.** The action is not unique or unusual. The BLM has experience implementing similar actions in similar areas. For instance, the Jeep Safari has had a BLM permit for this type of use since 1985. The environmental effects from the designation of the routes are analyzed in the EIS accompanying the 2008 Moab RMP. In addition, the impacts of authorizing permitted travel are also analyzed in the EA accompanying this FONSI. There are no predicted effects on the human environment that are considered to be highly uncertain or involve unique or unknown risks.
6. **The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.** The selected alternative neither establishes a precedent for future BLM actions nor represents a decision in principle about future considerations (beyond those actions described in the EA.) The actions considered in the selected alternative were considered by the interdisciplinary team within the context of past, present, and reasonably foreseeable future actions. Significant cumulative effects are not predicted. A complete analysis of the direct, indirect, and cumulative effects of the selected alternative and all other alternatives is described in Chapter 4 of the EA.
7. **Whether the action is related to other actions with individually insignificant but cumulatively significant impacts – which include connected actions regardless of land ownership.** The interdisciplinary team evaluated the possible actions in context of past, present and reasonably foreseeable actions. Significant cumulative effects are not predicted. A complete disclosure of the effects of the project is contained in Chapter 4 of the EA.
8. **The degree to which the action may adversely affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.** The action will not adversely affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the National Register of Historic Places, nor will it cause loss or destruction of significant scientific, cultural, or historical resources. Consultation with the State Historic Preservation Officer (SHPO) has been completed in accordance with Section 106 of the National Historic Preservation Act; the SHPO has concurred with a “no adverse effect” on cultural resources. The SHPO concurrence letter is included with the EA as Appendix H.
9. **The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973, or the degree to which the action may adversely affect: 1) a**

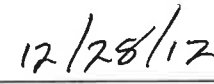


**proposed to be listed endangered or threatened species or its habitat, or 2) a species on BLM's sensitive species list.** Mitigating measures to reduce impacts to wildlife and fisheries have been incorporated into the design of the action alternatives. Although listed species occupy habitat within the project boundary, it has been determined that they will not be affected because mitigating measures have been developed. These measures are detailed in the EA and in the stipulations attached in Appendix A.

Endangered Species Act Consultation was initiated with the U.S. Fish and Wildlife Service (USFWS) on August 29, 2012; USFWS issued a Biological Opinion on September 5, 2012.

- 10. Whether the action threatens a violation of a federal, state, local, or tribal law, regulation or policy imposed for the protection of the environment, where non-federal requirements are consistent with federal requirements.** The project does not violate any known federal, state, local or tribal law or requirement imposed for the protection of the environment. State, local, and tribal interests were given the opportunity to participate in the environmental analysis process. Letters were sent to eight Native American tribes concerning consulting party status; only the Hopi Tribe responded. In addition, the project is consistent with applicable land management plans, policies, and programs.

  
\_\_\_\_\_  
Authorized Officer

  
\_\_\_\_\_  
Date



# United States Department of the Interior Bureau of Land Management

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Environmental Assessment  
DOI-BLM-UT-Y010-2011-0189

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December 2012

## Red Rock 4-Wheelers Jeep Safari and Fall Campout 10-Year Special Recreation Permit Renewal and Other Permitted, Non-Competitive Motorized Use of Jeep Safari Routes

*Location: Grand and San Juan Counties, Utah*

*Applicant/Address: Red Rock 4-Wheelers, Moab, Utah 84532 (for Jeep Safari)  
Moab BLM (for other permitted users)*

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**Red Rock 4-Wheelers Jeep Safari and Fall Campout 10-Year Permit Renewal and  
Other Permitted, Non-Competitive Motorized Use of Jeep Safari Routes  
Environmental Assessment  
DOI-BLM-UT-Y0101-2011-0189**

(Grayscale indicates changes to the EA made after the public comment period.)

## **1.0 PURPOSE & NEED**

### **1.1 Introduction**

This Environmental Assessment (EA) has been prepared to analyze the permitted, non-competitive, motorized use of several established routes within the Moab Field Office in Grand and San Juan counties, hereinafter referred to as “Jeep Safari routes.” In addition, several routes are proposed to be added to the list of Jeep Safari routes, hereinafter referred to as “Jeep Safari route additions”. This EA also includes the Spring Jeep Safari and Fall Campout for the Red Rock 4-Wheelers. The EA is a site-specific analysis of potential impacts that could result with the implementation of a proposed action or alternatives to the proposed action. The EA assists the BLM in project planning and ensuring compliance with the National Environmental Policy Act (NEPA), and in making a determination as to whether any “significant” impacts could result from the analyzed actions. “Significance” is defined by NEPA and is found in regulation 40 CFR 1508.27. An EA provides evidence for determining whether to prepare an Environmental Impact Statement (EIS) or a statement of “Finding of No Significant Impact” (FONSI). If the decision maker determines that this project has “significant” impacts following the analysis in the EA, then an EIS would be prepared for the project. If not, a Decision Record may be signed for the EA approving the selected alternative, whether the proposed action or another alternative. A Decision Record (DR), including a FONSI statement, documents the reasons why implementation of the selected alternative would not result in “significant” environmental impacts (effects) beyond those already addressed in the Moab Resource Management Plan (October 31, 2008).

### **1.2 Background**

The annual Moab Jeep Safari was initiated in 1966 by local residents and managed by the Moab Chamber of Commerce. Growth in the early years was slow, but by 1979, the Safari had grown to ten routes with an estimated 400 vehicles participating in the one day event. In 1985, the Red Rock 4-Wheelers, a Moab-based four-wheel drive club, took over the event and submitted an application to the BLM for a 5-year permit. The 5-year permit, an organized group Special Recreation Permit (SRP), was first approved beginning with the 1986 event for the use of 15 routes. The permit was renewed in 1991 and expanded to include a total of 28 existing routes for the spring event. This permit also included the Labor Day Fall Campout, a weekend camping experience. In 1990 and 1991, two routes were added to the Fall Campout, bringing the total number of routes involved to 30. All 30 routes were utilized during the spring event, and 8 of the 30 routes were made available for the Fall Campout. The 1995 Jeep Safari, a nine day event, included 1,450 registered vehicles and the Fall Campout, a 3 day event, included 137 registered vehicles.

The permit was renewed again in 1996, including all 30 of the previously approved routes (including 11 campsites for the Fall Campout). The 2000 Jeep Safari and Fall Campout events included 1,718 and 155 registered vehicles, respectively. The permit was renewed in 2001 and in 2006 for five years, with the same 30 routes and 8 of the 11 campsites included. The 2006 permit renewal included all permitted, non-competitive motorized use of Jeep Safari routes.

In 2007, a slight modification was made to one of the routes (Flat Iron Mesa) due to the sale of State land to a private individual. Because the permit was under appeal, the administrative law judge asked for a new Decision Record for the Moab Field Office. This new Decision Record extended the permit until the end of 2012.

The current action is for routes in the Moab Field Office only. Permits up until this time have included routes in both the Moab and Monticello Field Offices, with Moab having 27 of the 30 Jeep Safari routes under its jurisdiction. Due to the reissuing of the Moab portion of the permit in 2007, the Moab and Monticello BLM offices each issue their own Jeep Safari permits on routes within their office areas.

Use statistics for Jeep Safari for the period of 1996-2011 are summarized in Table 1.1.

**Table 1.1: Jeep Safari Participation, 1996 - 2011**

<b>Year</b>	<b>Spring Registered Vehicles</b>	<b>Spring User-Days</b>	<b>Fall Registered Vehicles</b>	<b>Fall User-Days</b>	<b>Total Registered Vehicles</b>	<b>Total User Days</b>	<b>Total Vehicle Days</b>
1996	1,488	9,102	253	1,012	1,741	10,114	3,890
1997	1,649	9,384	150	633	1,799	10,017	3,852
1998	1,730	9,361	150	635	1,880	9,996	3,845
1999	1,664	8,979	180	783	1,884	9,762	3,755
2000	1,718	8,509	155	618	1,873	9,127	3,510
2001	1,546	7,663	109	543	1,655	8,206	3,156
2002	1,493	6,836	96	586	1,589	7,422	2,855
2003	1,484	6,526	87	509	1,571	7,035	2,706
2004	1,440	6,484	109	588	1,549	7,072	2,720
2005	1,292	5,413	105	477	1,392	5,890	2,265
2006	1,457	6,896	111	519	1,976	7,415	2,852
2007	1,468	6,839	137	600	1,605	7,439	2,861
2008	1,387	6,498	132	625	1,519	7,123	2,740
2009	1,388	6,538	147	481	1,535	6,977	2,683
2010	1,589	6,496	166	417	1,755	6,913	2,659
2011	1,422	6,822	165	414	1,587	7,236	2,783

Note: "user-day" equals one person on public land for a day or a portion of a day. Vehicle days are derived by dividing total user days by 2.6, which is the average number of occupants per vehicle.

Permitted motorized use is of two types: commercial tours and organized group use, which includes events. Commercial tour companies guide clients in small groups (generally fewer than four vehicles) over authorized routes. Commercial tours are divided into two general types: 1) a

guide drives a vehicle and offers interpretation to guests riding in his or her vehicle, or 2) a guide drives a lead vehicle and guests drive or ride along in additional vehicles. Vehicles include full-sized four wheel drive vehicles (including 10 passenger Hummers), All Terrain Vehicles (ATV's and UTV's) and other smaller four wheeled vehicles, and dirt bikes. Commercial tour companies charge clients for their services. Organized group tours include club events (e.g., the Jeep Safari) and vehicle-affinity outings (e.g., an outing for Toyota owners). Organized groups usually charge only for expenses. The Moab Resource Management Plan (2008) requires groups with 25 or more vehicles to obtain an organized group SRP. Numbers of motorized SRPs and numbers of user days (excluding Jeep Safari) are summarized in Table 1.2.

**Table 1.2: Non-Jeep Safari Permitted Motorized Use, 2000-2011**

<b>Year</b>	<b>Number of Motorized SRPs</b>	<b>Number of User Days (non Jeep Safari)</b>
2000	14 (4 events/10 commercial)	1,794 event, 2,544 commercial; 4,338 total
2001	16 (5 events/11 commercial)	1,502 event, 3,617 commercial; 5,119 total
2002	22 (7 events/15 commercial)	2,433 event, 3,916 commercial; 6,349 total
2003	23 (8 events/15 commercial)	2,316 event, 6,244 commercial; 8,560 total
2004	22 (8 events/14 commercial)	2,076 event, 11,785 commercial; 13,861 total
2005	16 (6 events/11 commercial)	2,194 event, 9,518 commercial; 11,712 total
2006	18 (7 events/11 commercial)	2,080 event, 12,271 commercial; 14,351 total
2007	31 (14 events/17 commercial)	2,381 event, 11,413 commercial, 13,794 total
2008	34 (11 events/23 commercial)	2,528 event, 19,282 commercial, 21,810 total
2009	21 (6 events/15 commercial)	1,163 event, 12,843 commercial; 15,153 total
2010	29 (15 events/14 commercial)	3,042 event, 19,250 commercial; 22,292 total
2011	36 (20 events/16 commercial)	3,233 event, 19,833 commercial; 23,066 total

Although permittees are not required to report the number of vehicles utilized, the following assumptions have been made to convert user days into vehicle days. For commercial outfitters, the number of user days was divided by five to equal the number of vehicles. For organized events, the number of user days was divided by 2.6 (which is the actual average on Jeep Safari) to equal the number of vehicles. The total number of permitted vehicle days over the past ten years is shown in Table 1.3.



**Table 1.3: Total Numbers of Permitted Vehicle Days, 2000-2011**

<b>Year</b>	<b>Number of Jeep Safari Vehicle Days</b>	<b>Number of vehicle days permitted for other events</b>	<b>Number of commercial outfitter vehicle days</b>	<b>Total number of permitted vehicle days</b>
2000	3,510	690	636*	4,836
2001	3,156	578	904*	4,638
2002	2,855	936	979*	4,770
2003	2,706	891	1,561*	5,158
2004	2,720	798	2,946*	6,464
2005	2,265	844	1,903	5,012
2006	2,852	800	2,454	6,106
2007	2,861	915	2,282	6,058
2008	2,740	972	3,856	7,568
2009	2,683	447	3,030	6,160
2010	2,659	1,170	3,850	7,679
2011	2,783	1,243	3,966	7,992

\*Number of user days divided by 4 from 2000 – 2004. Number was increased to 5 in 2005 because of increase in Hummer tours; Hummers carry up to 9 clients.

### **1.3 Need for the Proposed Action**

The BLM needs to respond to the permit request from the Red Rock 4-Wheelers to host a motorized event on routes designated in the 2008 Moab RMP, as provided for in 43 CFR 2930. In order to do so, the Red Rock 4-Wheelers need to obtain a Special Recreation Permit. The routes used by the Red Rock 4-Wheelers and by other permitted users have been in existence for many years; all the routes (both current Jeep Safari routes and the proposed additions) are designated for travel in the 2008 Moab RMP. The proposed additions are needed to provide easier jeeping routes for Safari participants, or, in some cases, to add portions of commonly used designated routes to the primary route stem. The BLM's need is to consider the applicant's request consistent with BLM OHV regulations at 43 CFR 8340 and with the desire to minimize impacts to natural and cultural resources. These regulations allow the operation of vehicles on those routes designated as open. In addition, the BLM needs to respond to requests from other potential motorized permittees to utilize Jeep Safari routes (which are a subset of the designated route system).

The designated routes in the application are outside of Wilderness Study Areas and Natural Areas and are proposed where impacts to natural and cultural resources are minimized. In addition, stipulations attached to the permit as part of the proposed action minimize impacts to natural and cultural resources (see Appendix A for a list of stipulations). These stipulations would be attached to all permitted motorized use.

The majority of the routes were chosen by the proponents primarily for their highly scenic qualities and technical "jeeping" experiences. The Jeep Safari routes provide opportunities for the enjoyment of public lands by the recreating motorized public, including commercial and organized group users. Permitted users are governed by the stipulations attached to their permits

and thus are more likely to adhere to a set of responsible rules for OHV use. The commercial and organized group use of Jeep Safari routes facilitates public use and enjoyment by providing guided and supported services for individuals who may not otherwise be able to enjoy their public lands in this manner. Allowing permitted use on a subset of the designated route system in the Moab Travel Plan minimizes the potential adverse environmental effects of unstipulated motorized use.

#### **1.4 Purpose of the Proposed Action**

The Federal Land Policy and Management Act of 1976 (FLPMA) mandates multiple use of public lands, including recreation use. One type of valid recreation use is responsible motorized use. The BLM Special Recreation Permit regulations at 43 CFR 2930 provide for SRPs to be issued on public lands. The purpose of the proposed action is to consider authorizing the motorized use of Jeep Safari routes for all motorized Special Recreation Permit requests, including that for the Red Rock 4-Wheelers. The decision to be made is whether or not to grant these authorizations.

#### **1.5 Conformance with BLM Land Use Plans**

The proposed action described below is in conformance with the 2008 Moab RMP, approved in October of 2008 as required by the regulations at 43 CFR 1610.5.

Conformance with the 2008 Moab RMP is shown on the following pages:

REC-46 (page 97): Special Recreation Permits (SRPs): SRPs are issued as a discretionary action as a means to help meet management objectives, provide opportunities for economic activity, facilitate recreational use of the public lands, control visitor use, protect recreational and natural resources, and provide for the health and safety of visitors. Cost recovery procedures for issuing SRPs will be applied where appropriate.

REC-48 (page 98): All SRPs will contain standard stipulations appropriate for the type of activity and may include additional stipulations necessary to protect lands or resources, reduce user conflicts, or minimize health and safety concerns.

REC-50 (page 97): Issue and manage SRPs for a wide variety of uses to enhance outdoor recreational opportunities, provide opportunities for private enterprise, manager user-group interaction, and limit the impacts of such uses upon natural and cultural resources. Organized group permits required for groups with 25 or more vehicles.

TRV-11 (page 127): Designated routes – motorized: designate 3,693 miles of motorized routes (all proposed routes in this EA are designated in the RMP)

#### **1.6 Relationship to Statutes, Regulations, or other Plans**

This action will comply with the Federal Land Policy Management Act (FLPMA), and all other applicable statutes and regulations.

The action is consistent with the Master Plans for both Grand and San Juan counties, as outlined below.

Grand County's General Plan Update (2012) states that Grand County encourages the expeditious processing of use permits for economic uses of public lands. Furthermore, the Grand County General Plan Update further states that Grand County will be involved with public land managers with new and ongoing events and promote cooperation with the permitting process. The Grand County General Plan Update also recognizes the positive economic impacts of recreation tourism on the Grand County economy.

San Juan County's Master Plan (July, 1996) identifies recreation and tourism as an economic opportunity. The plan calls for working to promote recreation and tourism within the county.

### **1.7 Identification of Issues**

The Project Description was posted on the Environmental Notification Bulletin Board on June 1, 2011. An article in the *Moab Times Independent* (May 24, 2012) asked the public for scoping comments on the proposal. Fifty-six persons raised issues during the scoping period; of the responses, 54 persons raised issues to be discussed that supported the issuance of the permit. Two persons raised issues that discussed negative impacts that they felt resulted from the issuance of the permit. One organization also submitted scoping comments. The concerns raised by the public during the Scoping period are summarized in Appendix B.

Based on scoping comments from the public, and on issues raised internally (see Appendix C: Interdisciplinary Team Analysis Record) the following issues were identified for this action:

#### **1.7.1.1 Recreation**

What recreation benefit does the proposed action provide? What are the impacts on other recreation users?

#### **1.7.1.2. Riparian**

What impacts are there on the riparian zones, especially in Kane Creek Canyon, including potential degradation of riparian vegetation from direct vehicle impacts, and degradation of stream channels and bank stability, which affects riparian functioning condition.

#### **1.7.1.3 Socioeconomics**

What economic benefits are there to Grand County as a result of the proposed action?

#### **1.7.1.4 Wilderness Characteristics**

What impact to non-motorized users and to lands with wilderness characteristics (identified by BLM) do motorized permits have?

#### **1.7.1.5 Wildlife and Special Status Animal Species**

What impact do motorized permits have on wildlife, including special status animal species?

## **1.8 Issues Considered, but Eliminated from Further Analysis**

### **1.8.1 Air Quality**

Although motorized vehicles emit pollution, this proposal involves temporary and intermittent activities that occur over a wide area and at different times.

Air pollution due to any increased backcountry driving would be incremental. There are no impacts to air quality expected from this proposal. This issue will not be carried forward for further analysis.

### **1.8.2 Areas of Critical Environmental Concern**

Proposed routes traverse three Areas of Critical Environmental Concern (ACEC): Behind the Rocks, Highway 279/Shafer Basin/Long Canyon and Mill Creek Canyon ACECs. These ACECs were designated in the 2008 Moab RMP and included designated routes within them. The Behind the Rocks route is partially within the Behind the Rocks ACEC, the Long Canyon Road is within the Highway 279/Shafer Basin/Long Canyon ACEC and the Steelbender route was designated in the Mill Creek Canyon ACEC. All three of these routes are proposed for permitted travel by Jeep Safari and other commercial and organized group permittees.

ACECs are not roadless areas, but are managed to protect and prevent irreparable damage to important historic, cultural or scenic values, or fish and wildlife resources (FLPMA, 43 U.S.C. 1702(a)). All three of the ACECs in question are managed to protect scenic values. The presence of designated roads within the ACECs is not considered an impairment of these natural values. For instance, the Long Canyon Road (a heavily maintained route) is the means by which visitors view the scenic values of the ACEC. The Mill Creek Canyon ACEC includes the management prescription that "all recreational events will be confined to the designated roads in the ACEC" (2008 Moab RMP, page 108).

The management decisions for the three ACECs listed above specifically allow motorized travel on designated routes. Travel on designated routes is not surface-disturbing, and will not impair the values of the ACECs. This issue will not be carried forward for further analysis.

### **1.8.3 Cultural Resources**

Cultural Resources has been eliminated from further analysis in this EA. The Moab BLM Field Office, in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800, initiated consultation with the **eight** tribes who historically used this region and/or continue to use the area. In addition, consultation with the Utah State Historic Preservation Office was also initiated concerning the issuance of motorized Special Recreation Permits (SRP). A ten year re-authorization is being analyzed in this Environmental Assessment (EA). All activities would occur on designated routes per the 2008 Travel and Resource Management Plan (RMP). The analysis area does not include portions of routes crossing non-Federally managed lands. SRP applicants are responsible for getting the appropriate permits for their activities where routes cross such lands.

The current RMP has reshaped overall OHV travel in the Moab area by designating routes for all motorized use. The routes within this proposal represent those full sized vehicle routes that are of the most interest to the general public. They are widely advertised and are included in the most common guidebooks related to backcountry motorized travel.

Consultation with Native American Tribes and Utah State Historic Preservation Office (SHPO) was completed as a part of the RMP development process. Tribal consultation related to the RMP began with a letter from the BLM State Director sent in August of 2003. Tribal consultation was ongoing throughout the development of the RMP with a draft being sent to affiliated tribes in August of 2007 and culminating with a meeting attended by two of the consulting tribes in April of 2008, just prior to the implementation of the RMP. SHPO concurred with the BLM's recommendation of No Adverse Effect related to the implementation of the proposed RMP in 2008.

The current proposal includes 34 routes totaling 887 (federal and non-federal) miles. (The Chicken Corners and Lockhart Basin routes are partially located in the Monticello Field Office. These routes are designated open in the Monticello RMP). This event has been taking place formally since 1967 although 'Jeeping' as a recreational activity has been a part of the local culture since Jeeps were exsessed from the military following World War II. These vehicles facilitated the creation of the travel network which was largely related to mineral exploration.

It is estimated that commercial and organized group users of these routes represent 1% of the total usage. This information was collected in the last analysis completed for the Easter Jeep Safari EA in 2005. This means that if effects are occurring to sites within designated travel routes, the level of effect from motorized permittees, which represents a fractional amount of the total use, is indecipherable. Furthermore, the impacts from all commercial use are nominal. If adverse impacts are occurring to sites located on designated roads, it cannot be attributed to commercial and organized groups, and adverse impacts should be addressed. The methodology to address these impacts is articulated in the archaeological assurances discussion at the end of this section.

SRPs fall into the category of a Federal Undertaking. This requires the agency to take a look at their potential to affect historic properties. Archaeological sites located within the impact areas of roads designated as open in the MFO Travel Plan are not likely to be adversely affected by continued use. The creation, initial usage and maintenance of a given route would have caused the initial adverse effect. Indirect effects are an entirely different assessment. Commercial and organized group operators argue that since their trips are guided, there is more oversight, opportunity for education and less opportunity to damage sensitive archaeological sites. Since organized groups and commercial users constitute less than 1-2% of total usage, the indirect effects from this particular group is nominal.

The implementation of the RMP has greatly diminished the overall impacts from motorized traffic by limiting cross country travel and designating specific routes. The MFO does not believe that motorized SRPs have the likelihood to adversely affect significant cultural resources. Archaeological inventories are not necessary, per relevant policy (see attached policies below), to allow for continued use of existing roads, particularly those designated within the Moab Travel Plan. Therefore a finding of **"no historic properties are adversely affected"** is

warranted for this undertaking. The Utah State Historic Preservation Officer concurred with this finding on October 24, 2012.

#### Archaeological Assurances:

The travel network currently present in the Moab vicinity reflects the history of the area. This network was largely established prior to the National Environmental Policy Act; thus little attention was paid to resource conflicts and not much was done to record how particular routes came into being. Due to the lack of environmental planning, historically these routes have had an adverse effect on cultural resources. This can be seen in direct ways in that some sites are located within road corridors and in indirect ways in that the backcountry was opened up to many with nefarious intentions. Despite these effects, it is important to note that the existing travel network is a large part of the overall cultural landscape of the Moab area and should be treated accordingly.

As these roads are designated and open to the public and are widely advertised by commercial guides and travel books, it is difficult to differentiate users (i.e. the general public from commercial and organized group users) when assessing potential impacts to historic properties. These are public roads across public lands. Therefore, as we move away from the landscape level planning that was utilized in formulating the RMP and move toward site specific implementation of the travel plan, Moab Field Office (MFO) Archaeologists will utilize the following methods in managing cultural resources.

As committed to in the RMP, the MFO has been completing varying levels of inventories on full sized vehicle routes, often exceeding 'sampling'. The MFO will continue to do so. Moving forward, these inventories will be focused on the specific routes named in this proposal. These reviews will include:

- Historic overview of the given route
- Targeted pedestrian survey
- Monitoring of known sites within 50 feet of the center line
- Site specific recommendations where necessary

In the summer of 2012, the Field Office was able to complete two complete pedestrian inventories. The Steelbender and Deadman Point routes were completed with a finding of no adverse effects related to continued use.

When it comes to the attention of the MFO Archaeological staff that a site is potentially being affected by vehicular travel, the impacts will be evaluated as to whether the site is being adversely affected. Generally, when a prehistoric site is determined to be potentially eligible for nomination to the National Historic Register, it is a decision based on Criterion D. According to the direction provided by the National Park Service, Criterion D can be applied to sites "that have yielded or may be likely to yield, information important in history or prehistory." This criterion is most often applied to sites in the MFO where buried cultural deposits likely occur.

If a road cut exists in a potentially eligible site and is continuing to effect the eligibility determination, the following rationale will be used in shaping the appropriate course of action:

1. Analyze the potential to remove motorized use from the affected portion of the site
2. Armor, fence or otherwise protect the site to prevent further degradation
3. If necessary, complete the necessary testing and/or data recovery on the portion of the adversely affected site

Where a site has been adversely affected by an existing road in the past but has since stabilized, a monitoring plan may be established.

#### Specific Guiding Policy Concerning Archaeological Resources:

##### National Direction

- The BLM National Handbook 8100 states that, “The management of cultural resources (including but not limited to protection, public use, and scientific use of the resources) shall be guided by and in accordance with approved BLM land use plans, principally Resource Management Plans (RMP).”

##### Utah Direction

- The BLM Utah Handbook 8110 allows for flexibility when dealing with areas with significant prior surface disturbance as expressed in the following excerpt.

“Although complete Class III inventories are performed for most land use actions, a Field Manager may waive inventory for any part of an Area of Potential Effect when one or more of the following conditions exist:

1. Previous natural ground disturbance has modified the surface so extensively that the likelihood of finding cultural properties is negligible (Note: This is not the same as being able to document that any existing sites may have been impacted by surface disturbance; ground disturbance must have been so extensive as to reasonably preclude the location of any such sites.).
  2. Human activity within the last 50 years has created a new land surface to such an extent as to eradicate locatable traces of cultural properties.
  3. Existing Class II or equivalent inventory data are sufficient to indicate that the specific environmental situation did not support human occupation or use to a degree that would make further inventory information useful or meaningful.”
- Utah Handbook 8120 states that on existing BLM roads, “cultural resource inventories and evaluations consistent with Utah Handbook H-8110 must be completed before widening or other new surface disturbance occurs to ensure that significant cultural properties are protected from inadvertent damage or destruction. This requirement does not apply to normal road maintenance activities in which surface disturbance is confined to the existing roadbed.”

*Moab Field Office Resource Management Plan*

CUL-7

Class III inventory is not required prior to designations that allow continued use of an existing route, impose new limitations on an existing route, close an open area or travel route, keep closed area closed, or keep an open area open.

#### **CUL-8**

Class III cultural resources inventory will be conducted on newly designated ATV, motorcycle and mountain bike routes (48" wide or less) based on potential resource conflicts. Routes designated for travel in this plan will be sample inventoried based on potential resource conflicts. Routes identified for survey will be prioritized based on landscape level overviews, cultural resource predictive models, and available site location, environmental, and contextual information. If eligible archaeological sites along these routes are being adversely impacted by continued route use, impacts will be mitigated. "New routes" are defined as those designated in the Travel Plan accompanying this RMP.

#### **CUL-9**

Where there is a reasonable expectation that a proposed route designation would shift, concentrate or expand travel into areas where historic properties are likely to be adversely affected, Class III inventory and compliance with Section 106, focused on areas where adverse effects are likely to occur, is required prior to designation.

### **1.8.4 Soils, including Soils Crust, Erosion and Fugitive Dust**

The routes proposed for this permit have been designated in the Moab RMP Travel Plan. These designated routes are available for motorized travel year-long, including both permitted and non-permitted motorized travel. The proposal includes one way or exclusive use on narrow routes with high use, reducing potential for impacts as vehicles pass each other on a single track route. This reduces the potential for increased soil erosion from off road impacts. The proposal could increase use on these routes by up to 1%, with similarly small increases in impacts to soils and soil crusts that may lay adjacent to the roadbed.

Vehicles on dirt roads do create fugitive dust, which may bury soil crusts adjacent to the road and increase wind erosion rates. The impacts from fugitive dust are intermittent and widespread over a large area and over time. This issue will not be carried forward for further analysis.

### **1.8.5 Vegetation**

The routes designated in the 2008 Moab RMP are largely devoid of vegetation. All permitted use would be on designated routes only. Thus, the impacts to vegetation are minimal. This issue will not be carried forward for further analysis.

### **1.8.6 Visual Resources**

The Moab BLM manages public lands in a manner that protects the quality of scenic values. Visual Resource Management Classes were designated in the 2008 Moab RMP with a system of designated routes throughout them. Allowing use on the designated routes would not further impair visual resources because the vehicular use is temporary. Visual resources will not be carried forward for further analysis.



### **1.8.7 Water Quality, including those streams on the State 303d list**

This proposal involves several routes that cross perennial or intermittent streams. Most of these routes do not impact riparian resources or stream bank conditions, therefore this proposal would not affect erosion rates and associated sediment concerns.

Water quality monitoring has been conducted at Onion Creek and Kane Creek before, during and after several Jeep Safari events. Data showed short term increases in sediment loads (Total Suspended Solids and turbidity) which dissipated within 24 hours. Data also showed small amounts of petroleum hydrocarbons which are probably washed off the undercarriages of vehicles as the vehicles cross the stream, especially in high flow events. Within several hours of the Jeep Safari event, these materials are not detected. The proposed action could increase use on these routes by 1%, therefore the short term petroleum hydrocarbon levels could rise accordingly by up to 1%.

This proposal includes routes that cross two streams that are described in the 2010 State of Utah's Integrated Report and on the 303d list of impaired waters: Mill Creek and Onion Creek. Both streams are impaired in relation to stream temperature and TDS. These parameters will not be affected by this proposal.

The Steelbender route is an unmaintained, rugged D road which crosses Mill Creek four times. One of these stream crossings is steep and has erosion problems. Some vehicles have been using the edge of the road where there is less erosion and is easier to drive, causing the stream crossing to increase in width and decreasing bank stability. This proposal requires every vehicle to stay on the designated route and not enlarge any crossings.

The Rose Garden Hill Route uses the Onion Creek Road which is a County B Road maintained by Grand County. The road crosses Onion Creek 24 times with mostly low angle crossings.

### **1.8.8 Wilderness and Wilderness Study Areas**

There are no designated routes within Wilderness Study Areas (WSA) in the Moab Field Office. This means that there are also no proposed Jeep Safari routes that are within WSAs. There are, however, Jeep Safari routes that form the boundaries of Wilderness Study Areas. During the last permit renewal, a concerted effort was made to measure the width of the boundary routes to determine if these routes were being widened into the WSA. Measurements taken of tire tracks along the routes before and after the event were examined to see if the routes were widening. The EA accompanying the 2006 permit renewal found that route widening was generally not occurring along the boundaries of WSAs (see Appendix D).

What BLM measured for the data in Appendix D was tire track to tire track. Distance between tire tracks does not always equate to road widening. Distances between tire tracks should not be equated to permanent widening (or narrowing) of roads. The routes in question are boundary roads. The presence of tracks off these roads is not necessarily an incursion into the WSA as the widening could occur on the non-WSA side of the boundary. When boundary routes have widened into the WSA, the BLM has instituted fencing projects to take action to minimize road widening that could impact the WSA. Several successful examples include the fencing along the Behind the Rocks route on the south boundary of the Behind the Rocks WSA, fencing along the

Steelbender route on the boundary of the Mill Creek WSA, fencing in Pritchett Canyon on the boundary of the Behind the Rocks WSA and fencing along the Moab Rim, also on the boundary of the Behind the Rocks WSA.

When the measurements shown in Appendix D were taken, these routes were neither one-way or exclusive use. BLM determined that the principal cause of road widening, where it existed, was due to vehicles passing each other. One of the purposes of the requirement for exclusive use and one-way travel was to minimize potential road widening. The exclusive use and one-way requirement is also part of the present Proposed Action. This requirement is to prevent roads from widening into the WSAs.

Extensive monitoring of the event both before and after its occurrence found that there was no incursion of permitted vehicles into the WSAs from the boundary routes. Therefore, this issue will not be carried forward into the current analysis.

### **1.9 Summary**

This chapter has presented the purpose and need of the proposed project, as well as the relevant issues, i.e., those elements of the human environment that could be affected by the implementation of the proposed project. Alternatives are presented in Chapter 2. The potential environmental impacts or consequences resulting from the implementation of each alternative are analyzed in Chapter 4 for each of the identified issues.

## **2.0 DESCRIPTION OF ALTERNATIVES, INCLUDING PROPOSED ACTION**

### **2.1 Introduction**

Two alternatives were identified and are detailed below.

### **2.2 Alternative A – Proposed Action**

The Proposed Action is to issue a Special Recreation Permit to the Red Rock Four Wheelers for the motorized use on the designated routes listed in Table 2.1 and shown on Map 1. In addition, requests for all other motorized Special Recreation Permits would also be analyzed under this Proposed Action.

The Proposed Action includes the non-competitive, permitted motorized use of previously-authorized Jeep Safari routes (see Map 1). These previously-authorized routes total 630 miles, and are all within the Moab Field Office (the Chicken Corners and Lockhart Basin routes are analyzed in their entirety, even though they cross the boundary between the Moab and Monticello field offices.) In addition, the club has requested 152 miles of designated route be added to the list of Jeep Safari routes (of the newly requested road miles, 46 are on Class B roads and 106 are on Class D roads). See Maps 2a through 2l.

New route requests are not expected to increase overall participation in the Jeep Safari, but rather to provide more and varied options to Jeep Safari clients. The bulk of the new mileage requests are due to the desire to include “easier” routes in the Jeep Safari line-up so more novice drivers can participate. Many Jeep Safari routes have gotten more difficult over the years, and routes such as the Hook and Ladder/Cameo Cliffs options, Jackson Hole additions to Chicken Corners,

Fisher Valley, Copper Ridge additions, Deadman Point and Day Canyon Point provide easier options for less experienced drivers. In other cases, designated routes off long-established Jeep Safari routes are proposed for addition to the permit so that permitted users might be able to go on side routes that are open to any member of the public. For instance, the Hell's Gate spur to the Hell's Revenge route would be added to the list of permitted routes; Where Eagles Dare and Rusty Nail would be added to the options available to those travelling on the Golden Spike Route. One newly proposed route, Photographer's Run, is proposed so that a late-afternoon option would be available for participants who wish to take photographs in the Monitor and Merrimac area. All newly proposed routes are designated routes that are open to the public per the 2008 Travel Plan which was developed in conjunction with the Moab Resource Management Plan.

The Proposed Action includes commercial and organized group use, including the Red Rock 4 Wheelers Jeep Safari and Fall Campout events. However, use of the Day Canyon Point and Deadman Point routes would only be authorized for the Red Rock 4-Wheelers' Jeep Safari and not for any other commercial or organized group permits. All the routes are designated for motorized travel in the Travel Plan accompanying the 2008 Moab Resource Management Plan.

The Red Rock 4-Wheelers have submitted an application to renew its SRP for authorization of the annual Jeep Safari and Labor Day Fall Campout events for an additional ten years (2013-2022). The Jeep Safari offers guided vehicle trips on motorized routes; guides lead guests who drive their own vehicles over the route. During the Fall Campout event, the group camps at a predetermined site adjacent to a Jeep Safari route. No off-route travel would be permitted as part of the proposed action. All travel would be on roads designated in the 2008 Moab RMP.

The Red Rock 4-Wheelers portion of the Proposed Action seeks approval of a ten day event in spring and a four day event in Fall (on Labor Day weekend). The proposed routes, length of routes (miles) on BLM land, the maximum number of vehicles per route, number of Jeep Safari trips per year, an estimate of other permitted use, and the eight campsites for the Labor Day event are shown in Table 2.1. The "traditional" Jeep Safari routes are listed first; the additional requests for designated routes are listed at the end of Table 2.1.

The proposed action includes exclusive use on seven of the routes (Behind the Rocks, Cliff Hanger, Gold Bar Rim, Golden Spike, Moab Rim, Poison Spider and Pritchett Canyon) on days during which there is a Jeep Safari trip. The proposal also seeks restricting travel to one-way on three routes (Hell's Revenge, Kane Creek Canyon and Steel Bender) for all users on days with a scheduled Jeep Safari trip (see Table 2.1).

**Table 2.1: Proposed Permitted, Non-competitive, Motorized Use of Jeep Safari Routes, Including Jeep Safari (also see Maps 1 and Maps 2a – 2l)**

Route (see maps) * = campsite available for Fall Campout	Length on BLM (miles)  New routes split into B and D road mileage	Proposed Maximum Number of Vehicles/day for JS and/or Fall Campout/ Max. trips per year by Jeep Safari.	Extent of Proposed Commercial/organized group use (non-Jeep Safari) (low = under 100 vehicles/year; medium = 100-600 vehicles/year; high = 600 to 1200 vehicles/year; very high = 1200 to 3000 vehicles/year) Exclusive use/one way use for Jeep Safari week
<b>“Traditional” Jeep Safari Routes (analyzed in previous EAs; all designated routes in 2008 RMP) – 630 miles (see Map 1)</b>			
3-D	21.7	60/8 per year	Low
Behind the Rocks*	18.5	60/10 per year	Medium Exclusive use for Jeep Safari
Chicken Corners	9.7	50/6 per year	Medium
Cliff Hanger	4.4	55/8 per year	Low Exclusive use for Jeep Safari
Copper Ridge	16.0	55/5 per year	Low
Crystal Geyser	41.9	35/4 per year	Low
Dolores Triangle*	65.0	25/1 per year	Low
Dome Plateau*	88.7	50/8 per year	Low
Fins and Things	16.9	60/9 per year	High
Flat Iron Mesa	12.8	60/6 per year	Low
Gold Bar Rim (incl. Long Canyon and Gemini Bridges)	9.6	50/8 per year	High (majority of use on Long/Gemini) Exclusive use for Jeep Safari
Golden Spike*	8.1	45/10 per year	Medium Exclusive use for Jeep Safari
Hell Roaring Rim	29.7	50/5 per year	Low
Hell’s Revenge	5.3	60/9 per year	Very high One way (year round)
Hey Joe Canyon	19.2	50/4 per year	Low
Kane Creek Canyon	19.3	40/6 per year	Medium One way for Jeep Safari
Lockhart Basin*	47.3	25/1 per year (Fall only)	Low
Metal Masher	18.7	50/9 per year	Low
Moab Rim	5.0	50/9 per year	Medium Exclusive use for Jeep Safari
Poison Spider	8.5	60/9 per year	High Exclusive use for Jeep Safari
Porcupine Rim	5.5	45/4 per year	Low
Pritchett Canyon	4.7	35/4 per year	Low Exclusive use for Jeep Safari
Rose Garden Hill	36.0	40/5 per year	Low
Secret Spire	14.0	45/5 per year	Low
Sevenmile Rim	18.3	50/5 per year	High
Steel Bender	12.9	60/5 per year	Low One way for Jeep Safari
Strike Ravine	10.8	55/4 per year	Low

<b>Top of the World*</b>	<b>49.2</b>	<b>50/8 trips per year</b>	<b>Medium (largely Onion Creek)</b>
<b>Wipeout Hill</b>	<b>11.9</b>	<b>50/4 per year</b>	<b>Low</b>
<b>Proposed additional routes (47 miles of designated B route/106 miles of designated D route). All designated routes in 2008 RMP (see Maps 2a through 2l)</b>			
<b>Mashed Potatoes/Pickle/Tusher (additional mileage to 3D). See Map 2a</b>	<b>25.1 (17.1 B/8.0 D)</b>	<b>60/8 per year (same as 3D)</b>	<b>Low</b>
<b>Photographer's Run in Seven Mile Rim area. See Map 2b. –to provide easy scenic "run"</b>	<b>7.2 (0.4 B/6.8 D)</b>	<b>50/5 per year</b>	<b>Low</b>
<b>Hell's Gate/Escalator (additional mileage to Hell's Revenge). See Map 2c</b>	<b>0.4 (all D)</b>	<b>60/9 per year (same as Hell's Revenge)</b>	<b>Very High One Way (year round)</b>
<b>Rusty Nail/Where Eagles Dare (additional mileage to Golden Spike). See Map 2d</b>	<b>5.3 (all D)</b>	<b>45/10 per year (same as Golden Spike)</b>	<b>Medium Exclusive use for Jeep Safari</b>
<b>Jackson Hole (additional mileage to Chicken Corners). See Map 2e. Easier route</b>	<b>1.5 (all D)</b>	<b>50/6 per year (same as Chicken Corners)</b>	<b>Medium</b>
<b>Seven Mile Rim (additional mileage to Seven Mile Rim). See Map 2f</b>	<b>4.4 (all D)</b>	<b>50/5 per year (same as Seven Mile Rim)</b>	<b>High</b>
<b>Wipeout Hill. See Map 2g. Easier route</b>	<b>0.9 (all D)</b>	<b>50/4 per year (same as Wipeout Hill)</b>	<b>Low</b>
<b>Copper Ridge (additional mileage to Copper Ridge). See Map 2h. Easier route</b>	<b>3.3 (all D)</b>	<b>55/5 per year (same as Copper Ridge)</b>	<b>Low</b>
<b>Fisher Valley to USFS boundary (new route to Polar Mesa; primarily USFS). See Map 2i. Easier route.</b>	<b>8.3 (all B)</b>	<b>50/4</b>	<b>Low</b>
<b>Day Canyon Point (new route). See Map 2j. Easier route</b>	<b>5.2 (all D)</b>	<b>40/4</b>	<b>None: proposed only for Red Rock 4-Wheelers</b>
<b>Deadman Point (new route. See Map 2k. Easier route</b>	<b>17.4 (all D)</b>	<b>50/4</b>	<b>None: proposed only for Red Rock 4-Wheelers</b>
<b>Hook &amp; Ladder/Cameo Cliffs (new route). See Map 2l. Easier route</b>	<b>72.6 (20.1 B/52.5 D)</b>	<b>40/4</b>	<b>Low</b>

The stipulations applied to the 2006 permit renewal are incorporated as part of the proposed action (see Appendix A). Two of the routes cross from the Moab Field Office into the Monticello Field Office (Chicken Corners and Lockhart Basin). These routes are included in this EA in their entirety.

In addition, the permitted use of these routes on a year-round basis for guided motorized commercial tours and activities and guided organized group tours and events will be analyzed, with the exception of Deadman Point and Day Canyon Point, which are analyzed for Jeep Safari use only. Lockhart Basin, Jackson Hole and Chicken Corners are being analyzed for non-Jeep Safari permitted use only for permits issued by the Moab Field Office.

### **2.3 Alternative B – No Action**

Under the No Action Alternative, the BLM would not renew the Red Rock 4-Wheelers permit. The annual Jeep Safari and the Labor Day Fall Campout as organized events would not be authorized on public lands. Applications for permitted motorized use would not be authorized using the present analysis. No permitted users would operate with stipulations in place to protect sensitive resource values. Private (and non-permitted) use of these routes would continue to occur.

### **2.4 Alternative Considered but Eliminated from Further Analysis**

The Southern Utah Wilderness Alliance requested in its scoping comments that the BLM consider an alternative that eliminated all requested routes that cross lands in the proposed America's Red Rock Wilderness Act (ARRWA). **SUWA claims that over 100 miles of the requested routes are on roads within ARRWA.** Those lands have been inventoried and evaluated for wilderness characteristics as part of the development of the 2008 Moab RMP. Although a subset of the America's Red Rock Wilderness lands are deemed by the BLM to possess wilderness characteristics, none of the lands in question are managed to protect, preserve or maintain their wilderness characteristics. (BLM-determined lands with wilderness characteristics are analyzed in the body of this document).

Routes that are designated within lands in the proposed America's Red Rock Wilderness Act are available for motorized travel. The OHV regulations at 43 CFR 8340 allow the operation of off-road vehicles on those routes designated as open to off-road vehicle use. It is not reasonable to disallow use of these routes to permitted users only. See also response to scoping comments for a discussion of wilderness inventories and their findings (Section 1.7)

The Southern Utah Wilderness Alliance also requested an analysis of an alternative that protects resources including water quality, soils and soil crusts, native vegetation, riparian areas, cultural resources and air quality. The range of alternatives being considered (Proposed Action vs. No Action) enables the BLM to exclude one or more routes for unacceptable impacts to resources by permitted users. Therefore, the BLM has not analyzed alternatives that exclude routes based specifically on various resource conflicts.

## **3.0 AFFECTED ENVIRONMENT**

### **3.1 Introduction**

This chapter presents the potentially affected existing environment (i.e., the physical, biological, social, and economic values and resources) of the impact area as identified in the Interdisciplinary Team Checklist found in Appendix C and presented in Chapter 1 of this assessment. This chapter provides the baseline for comparison of impacts described in Chapter 4.

### **3.2 General Setting**

Previously authorized Jeep Safari routes traverse 630 miles of BLM lands in the Moab Field Office (these miles include those portions of the Lockhart Basin and Chicken Corners routes that are in the Monticello Field Office). In addition, the Red Rock 4-Wheelers have proposed an additional 152 miles of route to be added to the Jeep Safari network. All of the requested routes have been designated for travel by the BLM in the 2008 Moab RMP. The routes are comprised

of various types of non-paved roads, including County B (regularly maintained to two wheel drive standards) and County D (not regularly maintained – generally four wheel drive) roads. All travel on Jeep Safari routes for any permitted purpose is on designated routes only.

### **3.3 Resources/Issues Brought Forward for Analysis**

The following resource issues were brought forward for analysis: recreation, riparian resources, socioeconomics, wilderness characteristics and wildlife, including special status species. See Appendix C, Interdisciplinary Team Analysis Record. Monitoring information of these resources (not specific to the Jeep Safari event itself) established baseline measures describing these resources.

#### **3.3.1 Recreation**

Most Jeep Safari routes are routes that have been used for many years for mining, oil and gas development, filming, livestock grazing, wood gathering, and recreation. Indeed, the majority of Jeep Safari routes were developed for minerals exploration and development. No Wilderness Study Areas or Natural Areas are crossed by any Jeep Safari route. All of the proposed routes were designated for travel in the Travel Plan accompanying the 2008 Moab RMP. The primary use of the routes is for recreational travel. Due to the rugged topography of the area, Jeep Safari routes provide the access for many recreational opportunities, including motorized vehicle use, sightseeing, mountain biking, hiking and camping.

Historically, recreation use is heavy during spring with another period of moderate use during the fall. Spring use starts in February, peaking with Easter weekend, whenever that may occur in a given calendar year. Use levels remain high until Memorial Day weekend when another peak is experienced. Use then tapers down throughout the summer. The Labor Day weekend initiates the fall season, when recreation use again increases, but only to moderate levels. This use continues through Thanksgiving weekend. Recreation use in December and January is relatively light.

In addition to the Jeep Safari event (which had 7,236 user days and 2,783 vehicle days in 2011), there are 36 commercial and organized group permittees that provide motorized tours along the Jeep Safari routes (20 organized group and 16 commercial outfitters). The total permitted use of these routes amounted to 30,302 user days in 2011; 7,236 user days for Jeep Safari's two events, 3,233 user days for non-Jeep Safari events, and 19,833 user days for commercial tour operators. It should be noted that each vehicle carries multiple passengers (many commercial tour vehicles carry up to 9 passengers). This means that the number of vehicles on the routes is far fewer than the user days. It is estimated that 30,302 user days would be the equivalent of about 6,000 vehicle days.

For comparison purposes, there were 20,933 total permitted motorized user days in 2004 (11,785 commercial, 2,076 organized group and 7,072 Jeep Safari user days). Examination of these figures shows a growth in organized group user days because the 2008 Moab RMP required groups over 25 vehicles to obtain a permit from BLM. In addition, commercial user days have increased since 2004 (from 11,785 to 19,833 user days) largely because of the popularity of Hummer tours on one Jeep Safari route, Hell's Revenge. The growth of permitted motorized use



over the last seven years (44%) has been modest, particularly given the new requirement in the 2008 Moab RMP requiring permits for relatively small groups of drivers.

While permitted use is a known quantity, estimating private use, especially on a route by route basis, is difficult. Visitation to the Moab Field Office has been studied in a systematic fashion since 2002, using Utah Department of Transportation data, field office installed traffic counters on key access roads, trailhead registers, a National Visitor Use Monitoring Study conducted in 2006, campground data and other sources of information. A key element of this data is an estimate of number of persons per vehicle. Based on a multiplier of 2.52 passengers per vehicle (the average for Canyonlands National Park visitation), the Moab Field Office hosted 1,809,702 visitors in 2011. If a multiplier of 3.12 passengers per vehicle is used (the average for Dead Horse Point State Park), the Moab Field Office hosted 2,240,583 visitors in 2011. It is important to note that this visitation study gathers aggregate data on visitation to the entire field office. The study gives no accounting of visitor numbers to specific Jeep Safari routes, nor does it separate visitors by chosen recreation activity. That is, this number includes those visitors whose focus is nonmotorized activity, as well as those whose focus is motorized activity. At any rate, the number of private visitors (around 2 million) overwhelms permitted motorized users (around 30,000).

The percentage of permitted motorized users compared to private motorized users gives an indication of the extent of private motorized use. Using traffic counter data and post-use reports, a specific examination of private vs. permitted use on six routes revealed the following percentages:

- Behind the Rocks: 1.46% of use was permitted
- Strike Ravine: 0.55% of use was permitted
- Gemini Bridges/Gold Bar Rim/Metal Masher and Golden Spike: 2% of use was permitted
- 3D: 0.07% of use was permitted
- Sevenmile Rim: 2.6% of use was permitted
- Hell's Revenge (the most popular permitted route): 4.4% of use was permitted

Although Jeep Safari may have been somewhat responsible for popularizing motorized use of public lands in the Moab area historically, it is not the driver of that use today. Since its inception, Jeep Safari grew rapidly, with participation peaking in 1999 at 1,884 vehicles. Since that time, participation in Jeep Safari has ebbed and flowed, but has never approached 1999 peak use (see page 2 of this document for the last ten year trend). Although it can be argued that early Jeep Safari events helped pique the interest in Moab as a destination for motorized recreation, that causal link occurred in decades past and is now likely only secondary. For example, during Easter week now, Jeep Safari participants are but a small percentage of the motorized users that are in Moab. It would appear that "Easter in Moab" has become the main attraction (and source of resource and user conflicts).

Today, the publicity concerning Moab as a "Mecca" for motorized recreation comes from magazine articles, Utah Travel Council publicity, advertising copy, commercial books, videos and maps, and website promotion. For example, a simple Google search for "Moab + jeep" results in 2,880,000 "hits." Moab is heavily advertised as "The Adventure Capital of the



World,” with an emphasis on “extreme” activities. These sources of information are now the primary factors driving any increases in motorized visitation, rather than the Jeep Safari, commercial tours, or any other organized permitted events. All of the routes are open to general use by the public and are displayed on commercial maps; Jeep Safari routes are listed in various guidebooks.

Since Jeep Safari routes have become “named” features, with such alluring monikers as “Hell’s Revenge,” “Metal Masher,” and “Steel Bender,” they are the routes likely to be highlighted in commercially available books, maps, and videos. This means that private users tend to seek out these routes, leaving the rest of the dirt roads in Grand and San Juan counties less utilized. For example, on the Utah Travel Council website, clicking on “Moab Area Off-road Trails” brings up only a list of the more popular of the Jeep Safari routes, with detailed descriptions of each one. Those Jeep Safari routes that are difficult and near Moab are those that have become popular. Some of these popularized routes are Hell’s Revenge, Fins and Things and Poison Spider. There are 17 of the “traditional” Jeep Safari routes that have never captured the attention of the motorized public, such as Copper Ridge, Flat Iron Mesa, and Hell Roaring Rim.

In some locations, travel off the designated routes has caused adverse effects to wildlife, visual, cultural, soil, vegetation, and riparian resources. Short-cutting, making parallel routes, detouring around challenging segments, and widening routes threatens their integrity, and makes the routes less attractive for recreation use, thus reducing their value for commercial recreation and special events. The proliferation of multiple routes off long established and designated roads also contributes to confusion among users as to their location on the ground. The degradation caused by off-route, illegal users can be extensive. That is, a small percentage of irresponsible motorized users, when aggregated, can have noticeable effects. This is particularly true in popular locations such as Gold Bar Rim and Poison Spider. To minimize these concerns and prevent future degradation, the BLM designated routes open to travel in conjunction with the 2008 Moab RMP. This Travel Plan requires that motorized vehicles stay only on designated routes. The BLM has made recent efforts to utilize infrastructure that helps ensure compliance with the designated route plan. It should be noted that there is no documented evidence of willful off-route travel by permitted motorized users.

User conflict is another component of the recreation issue. Many types of recreationists, including non-motorized users such as mountain bikers and hikers, use Jeep Safari routes. On some of the routes, such as Cliffhanger, Moab Rim, and Steel Bender, the predominant use on a year-round basis is non-motorized, primarily bicycles. There is anecdotal evidence of user conflict between motorized and non-motorized users, especially during Easter, on some of the Jeep Safari routes. Conflict is greatest on those routes that are closest to town, and are therefore the most popular with both motorized and non-motorized users. These routes include Cliffhanger, Golden Spike, Moab Rim, Poison Spider, and Pritchett Canyon. User conflict is most apparent during the spring season, when visitation peaks. During less crowded times of the year, user conflict wanes or is non-existent. The disturbance of non-motorized recreation visitors has also been reported as a result of motorized traffic on Hey Joe Canyon. This route parallels the Green River, which is popular with canoeists and other boaters.

Another potential source of conflict is visitor displacement. As is the case of any large event, (such as Jeep Safari but also the Canyonlands Half Marathon or the 24 Hours of Moab mountain bike race or a major commercial filming project), a large increase in the number of recreation visitors to the MFO can lead to a shortage of available lodging or camping. To the extent that visitors cannot reschedule their trips to avoid these large events, they may have to forego a visit to the Moab area. This is more likely to occur in Spring than in other seasons, given that season's popularity for recreation visitation to the MFO. There is some evidence indicating that some recreationists are scheduling visits to avoid the week before Easter, perhaps to avoid the crowding associated with Easter and its Jeep Safari. It would seem that at least some of these visitors are able to reschedule their trips, as evidenced by the fact that BLM campground use peaks in the weeks immediately preceding and following Easter Jeep Safari.

### 3.3.2 Riparian Resources

"Riparian areas are a form of wetland transition between permanently saturated wetlands and upland areas. They are defined as an area of land directly influenced by permanent (surface or subsurface) water. They have visible vegetation or physical characteristics reflective of permanent water influence... Excluded are such sites as ephemeral streams or washes that do not exhibit the presence of vegetation dependent upon free water in the soil." (*BLM Utah Riparian Management Policy*, 2005). Although all the routes requested in the proposal are routes designated in the 2008 Moab Resource Management Plan, several of these routes cross or are within riparian areas. These riparian areas are listed in Table 3.1.

**Table 3.1: Stream Systems Crossed by Requested Jeep Safari Routes**

Bartlett Wash	Hunter Wash
Brink Spring	Kane Creek
Cottonwood Creek	Little Canyon
Courthouse Wash	Little Grand Wash
Cow Canyon	Mill Creek
Cowskin Canyon	Onion Creek
Dolores River	Pritchett Canyon
Fisher Creek	Salt Wash
Gold Bar Canyon	Spring Canyon
Granite Creek	Ten Mile Wash
Green River	Tusher Canyon
Hidden Canyon	Waring Canyon

Of the routes listed in Table 3.1, two (Dolores River and Kane Creek) are unstable during high stream flow conditions (generally during spring, when the stream flow is higher than normal, as well as during summer flooding). The Dolores Triangle Route crosses the Dolores River, and is only passable by vehicles when the river flows are less than 200 cubic feet per second. The stream banks at the proposed Dolores River crossing are well vegetated and moderately sloped. Since this crossing is regularly maintained by the Grand County Road Department, the streambanks adjacent to the stream crossing are in stable condition.

The southern, unmaintained portion (11 miles long) of the Kane Creek Route is extremely challenging in high water conditions. The designated route crosses Kane Creek numerous times

(up to 60 times) throughout the seven miles, some of which is within a narrow canyon. There is often a crossing every 500 to 1000 feet. Because of the narrow canyon topography, there is no room for road re-alignment to avoid these crossings. Kane Creek drains snowmelt from the LaSal Mountains and can have higher stream flows in spring time. This can raise water levels one to two feet, making some crossings more difficult. Because this route is rated as a difficult route, with challenging stream crossings and several steep hill climbs, overall use is estimated to be lower than on other routes. Due to the difficulty and tight nature of the route, it is better suited for use by smaller vehicles such as dirt bikes and ATVs.

Summer thunderstorms can produce large flash floods in Kane Creek which erode unvegetated stream banks, especially at road crossings. Motorized travel after a large flood can be problematic, as motorists try to find easy places to cross the stream and avoid steep cut-banks, deep pools and/ or mud-holes at the existing crossings. Because of the density of road crossings in Kane Creek and the frequent large floods, the route is often changing. This further destabilizes the stream banks and affects the riparian resources.

Twenty four of the proposed Jeep Safari routes cross riparian areas, with a total of 123 crossings. Some crossings are used by two different routes and are not counted twice (Onion Creek and Kane Creek). Forty-one (33.5% of total) of these crossings are located on roads maintained by Grand County (class B roads) and eighty-two stream crossings (66.5% of total) are located on unmaintained roads (class D roads). See Table 3.2 for details by route.

The Kane Creek Route has the highest density of crossings, with 60 crossings in seven miles. Over the last 30 years the crossings in Kane Creek Canyon have become more difficult due to mud holes or steep banks. Private users often drive vehicles around these obstacles, making the crossing wider and the stream banks less stable as well as impacting riparian vegetation at these sites.

Nine of the designated routes requested by the proponent are located within a riparian corridor for a portion of the route. The total number of miles where these designated routes are within the riparian area is 23.75 miles. Fewer than three miles (2.85 mile, or 12% of total) of these designated routes occur within a riparian corridor on a maintained class B road. About 21 miles (20.9 mile or 88% of total) of these routes occur within a riparian corridor on unmaintained class D roads. The road segments within the riparian zone range from 0.02 miles in length (near Brink Spring) to 8.0 miles in length (along the Green River). See Table 3.2 for details by route.

The Seven Mile Rim Route travels in Tusher Wash for 1.25 miles on an unmaintained D road. Motorized use, both private and permitted, has destabilized the stream banks in this section, causing the loss of 25% of associated riparian resources over the last 10 years.

The Steelbender Route has four crossings in Mill Creek. The southern-most crossing, near Flat Pass, is in poor condition. The steep crossing is in bedrock, and has become very challenging for vehicles to cross. Private motorists are widening the crossing as they try to cross at an easier spot, destroying riparian vegetation adjacent to the crossing.

**Table 3.2: List of Designated/Proposed Routes and Associated Riparian Resources**

Route	Stream system	Class of Road	# of route crossings riparian area	Miles in Riparian Zone
3-D	Hidden Canyon	D		0.85
3-D	Brink Spring	D	2	0.20
Behind the Rocks	Hunter Wash	D		1.50
Chicken Corners	Kane Creek	B	1	
Cliff Hanger	Kane Creek	D	1	
Copper Ridge	Courthouse Wash	D		0.40
Crystal Geyser	Little Grand Wash	B	1	
Crystal Geyser	Salt Wash	B	2	0.03
Crystal Geyser	Ten Mile Wash	B	2	
Dolores Triangle	Granite Creek	D	1	1.50
Dolores Triangle	Cow Canyon	B	2	
Dolores Triangle	Dolores River	B	1	
Dolores Triangle	Cowskin Canyon	B		1.50
Gold Bar Rim/Long Cyn, Gemini	Little Canyon	D	2	0.10
Hey Joe Canyon	Spring Canyon	B	3	
Hey Joe Canyon	Green River	D		8.00
Kane Creek Canyon	Kane Creek	D	60	7.00
Kane Creek Canyon	Kane Creek	B	1	
Metal Masher	Little Canyon	D	1	
Pritchett Canyon	Pritchett Canyon	D	8	
Rose Garden Hill	Onion Creek	B	24	
Rose Garden Hill	Cottonwood Creek	B	1	1.00
Sevenmile Rim	Tusher Wash	D		1.25
Steel Bender	Mill Creek	D	4	
Top of the World	Onion Creek	B	24	
Top of the World	Waring Canyon	B	1	
Top of the World	Cowskin Canyon	B	1	
Mashed Potatoes Pickle Tusher (add to 3D)	Bartlett Wash	D		0.12
Mashed Potatoes Pickle Tusher (add to 3D)	Bartlett Wash	B		0.30
Photographer's Run in Seven Mile Rim area	Mill Canyon	D	1	
Photographer's Run in Seven Mile Rim area	Courthouse Wash	D	1	
Rusty Nail/Where Eagles Dare (add to Golden Spike)	Gold Bar Canyon	D	1	
Fisher Valley to USFS boundary	Fisher Creek	B	2	
Hook & Ladder/Cameo Cliffs	West Coyote Wash	D		

### 3.3.3 Socioeconomics

The Moab community has depended largely on recreation and tourism since the 1980's. As of 2009, recreation and tourism supported 44% of private wage and salary employment in Grand County (*Headwaters Economics*, 2011). In 2009, the largest component of travel and tourism-related industries was accommodation and food services (i.e., hotels, restaurants, bars, etc.), which supported 1,214 private wage and salary jobs, representing 82 percent of travel and tourism-related jobs. The exact proportion of the jobs in these sectors attributable to expenditures by visitors, including business and pleasure travelers, versus by local residents, is

unknown without additional research. It is safe to assume, however, that the majority of these sectors rely on out-of-area visitors (*Headwaters Economics*, 2011). In addition to private wage and salaried employees, recreation visitation to Grand County also supports proprietors and the self-employed in recreation and tourism-related industries as well as government employees involved in recreation and tourism.

In 2011, there were 35 motorized permits issued, including the Easter and Labor Day Jeep Safari permits. These included 16 commercial outfitters supplying motorized tours to clients, with gross receipts on BLM of \$1,407,539.67 in 2011 (SRP post-use reports). Organized motorized events also generate money for the local economy; in addition, by holding events in the “off-season,” money may be generated at times when business is otherwise slow. In 2011 there were 19 events that generated local business receipts.

In addition to direct employment income, Grand County’s recreation and tourism industry creates “ripple effects” in the broader economy, to the extent that resident employees and proprietors spend their earnings locally on other goods and services. Although Moab BLM administers motorized recreation permits in both Grand and San Juan counties, it is highly probable that most associated economic activity takes place in Grand County, given its well-developed recreation support infrastructure.

It is possible to estimate the direct and indirect employment and income events of specific recreation activities, including Jeep Safari, but also of permitted motorized recreation use in Grand County. A widely used economic impact tool is IMPLAN (IMPact Analysis for PLANning), a regional economic model that provides a mathematical accounting of the flow of money, goods, and services through a region’s economy. The model provides estimates of how a specific economic activity translates into jobs and income for the region. It includes the ripple effect (also called the “multiplier effect”) of changes in economic sectors that may not be directly impacted by management actions, but are linked to industries that are directly impacted. In IMPLAN, these ripple effects are termed indirect impacts (for changes in industries that sell inputs to the industries that are directly impacted) and induced impacts (for changes in household spending as household income increases or decreases due to the changes in production). Further explanation of the IMPLAN tool is found in Appendix E.

The following description is based on visitation data and on data collected by Moab BLM in 2006 relating to patterns of recreation use and recreation spending (NVUM, 2007). Among other variables, the NVUM study collected data on day use versus overnight, and lodging and commercial camping versus camping on BLM. NVUM also collected data on average expenditures by recreation visitors to Moab BLM for each of these categories<sup>1</sup>. NVUM did not distinguish among *types* of recreation activities (e.g., hiking versus OHV use) within these categories.

Table 3.3 shows estimates of economic impacts from the Jeep Safari event itself (in 2011), for both Spring and Fall events, as well as the much larger Spring event. Table 3.3 also shows the economic impacts from *all* permitted motorized recreation (including Jeep Safari) in 2011.

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<sup>1</sup> The U.S. Forest Service, the developers of NVUM, has compiled data for all USFS units in the United States. Moab BLM was one of a small number of BLM offices enrolled in a pilot study of NVUM’s applicability to BLM.

**Table 3.3: Estimated Economic Impacts of Jeep Safari Events and All Motorized Permitted Recreation in 2011 (2012 dollars)**

<b>Jeep Safari Only-Both Events</b>			
<i>Impact Type</i>	<i>Employment</i>	<i>Labor Income</i>	<i>Output</i>
Direct Effect	10.01	\$281,993	\$704,001
Indirect Effect	0.88	\$30,521	\$99,059
Induced Effect	1.00	\$31,963	\$106,204
<b>Total Effect</b>	<b>11.89</b>	<b>\$344,478</b>	<b>\$909,264</b>

<b>Jeep Safari Only-Spring</b>			
<i>Impact Type</i>	<i>Employment</i>	<i>Labor Income</i>	<i>Output</i>
Direct Effect	9.06	\$249,729	\$640,416
Indirect Effect	0.82	\$28,404	\$92,141
Induced Effect	0.90	\$28,487	\$94,654
<b>Total Effect</b>	<b>10.77</b>	<b>\$306,620</b>	<b>\$827,210</b>

<b>All Permitted Motorized Use</b>			
<i>Impact Type</i>	<i>Employment</i>	<i>Labor Income</i>	<i>Output</i>
Direct Effect	31.9	\$898,929	\$2,255,546
Indirect Effect	2.8	\$97,296	\$315,782
Induced Effect	3.2	\$101,891	\$338,554
<b>Total Effect</b>	<b>37.9</b>	<b>\$1,098,116</b>	<b>\$2,902,814</b>

At first glance, these economic impacts may appear small. As discussed under the recreation section, however, permitted motorized recreation in general (including Jeep Safari itself) comprises a very small share (around 1%) of total annual recreation visitation to Moab BLM. To the extent, if any, that permitted motorized recreation displaces other recreationists and visitors, the benefits outlined above could be lower. To the extent that spending in the local economy by motorized recreationists exceeds NVUM estimates, the benefits could be higher.

In addition to the effects described in the Table 3.3, Moab City and Grand County (and to a lesser extent, San Juan County) collect a variety of taxes from the sales of goods and services related to Jeep Safari and other permitted motorized activities. These include sales taxes, transient room taxes, resort community taxes, restaurant and car rental taxes. It is not possible to separate out these fiscal benefits from those arising from other, non-related recreation and tourism activities. To the extent, if any, that permitted motorized recreation displaces other recreationists and visitors, the benefits outlined above could be lower.

### 3.3.4 Wilderness Characteristics

As part of the 2008 RMP, the Moab BLM undertook an inventory to find out which of its lands possessed wilderness characteristics. A subset of those lands was chosen to be managed to protect, maintain and preserve those wilderness characteristics. These lands are called "Natural Areas"; there are no Jeep Safari routes within the Natural Areas. The remainder of the lands inventoried as having wilderness characteristics is managed for other uses, including all forms of recreation.

The 2008 Travel Plan that accompanying the RMP designated the following requested routes within those areas possessing wilderness characteristics:

- 1) 0.61 mile route around Hammerhead Rock on the Flat Iron Mesa route;
- 2) 0.28 mile spur on the Gold Bar Rim Route,
- 3) 0.22 mile of route on Moab Rim;
- 4) 0.41 mile spur on Steel Bender
- 5) 4.06 miles of route on the Day Canyon Point route;
- 6) 3.33 miles of route on the Deadman route;
- 7) 3.17 miles of route additions to the Golden Spike.

There are 12.08 miles of designated route within lands possessing wilderness characteristics that are requested in the Proposed Action.

### **3.3.5 Wildlife including Threatened and Endangered Species**

Many previously-authorized Jeep Safari routes and proposed Jeep Safari Routes traverse various wildlife habitats.

#### ***Threatened and Endangered Species***

Re-initiation of formal consultation with U.S. Fish and Wildlife Service (Service) was completed in August 2012. The Service responded on September 5<sup>th</sup>, 2012, indicating that the original and new additions to the 10-year SRP permit renewal would not change the Biological Opinion that was issued on January 6<sup>th</sup>, 2006. If new MSO or SWFL nesting occupancy occurs, the Service will be contacted and consultation may be re-initiated.

Threatened and Endangered Species that could be found near selected Jeep Safari routes include the Mexican Spotted Owl, the Southwestern willow flycatcher, and the endangered fish species of the Colorado River Basin (razorback sucker, humpback chub, Colorado pikeminnow and bonytail chub). Habitat for one candidate species, the Gunnison sage-grouse, is also found.

#### ***Mexican Spotted Owl:***

MSO habitat includes high canopy closure, high stand density, and multi-layered canopies of uneven-age mixed conifer stands. Steep sloped canyons with rocky cliffs and a mesic quality characterize much of the MSO habitat in Utah; owls are known to nest in steep-walled canyon complexes and rocky canyon habitat within desert scrub vegetation.

Southwest Research has been conducting MSO Protocol presence/absence surveys in the Moab FO area on permit and project areas and other area of concern since 2001. There have been no owls detected within 0.5 mile of any Jeep Safari routes. Additionally, the Moab Field Office committed to the Service in the 2005 and again in 2012 to continue to survey according to the MSO Recovery Plan in areas with suitable MSO nesting habitat that could be impacted by activities on Jeep Safari routes. Since the onset of these studies, one known Protected Activity Center (PAC), the Big Chief PAC, has been identified. This PAC is located over one mile from the newly-proposed Day Canyon Point route and over

three miles from the additional Jackson Hole route and approximately one mile away from the Long Canyon Jeep Safari route. This PAC was identified in 2001 by Southwest Research and has successfully fledged every year since, except for 2002.

In 2003 a single male Mexican spotted owl was detected on the first visit near the Canyonlands National Park border on the East Shafer Trail Road and in 2004, MSO response was documented during the first visit in the same area. In 2009, a lone male was detected on several visits in this same area. The nearest route to this MSO detection is the Jackson Hole addition, which is over six miles away and on the other side of the river from where this owl has been heard.

In 2007, a single juvenile owl was heard on one outing and a follow-up visit located the potential nest site, though no adults were heard and further investigations indicated the nesting attempt had failed. This location was approximately 1.5 miles northeast of the Canyonlands National Park boundary off the Shafer Trail in a side canyon on the Dead Horse Point State Park boundary. All access has been closed to this area and annual monitoring indicates there has not been any future nesting. This site is over 5 miles from both the Day Canyon Point and Jackson Hole routes.

In 2012 a single owl was detected in Hell Roaring Canyon on two visits. On one visit a visual detection also occurred, but extensive investigation on the fourth outing did not detect this individual again. The Deadman Point route parallels Hell Roaring Canyon approximately 0.25 to 0.3 miles from the canyon rim, with the MSO location and potential PAC is slightly over one mile from this route.

Other than the known Big Chief PAC, no other nesting pairs have been located within the Moab Field Office as of the terminus of the field season, 2012.

#### *Southwestern Willow Flycatcher:*

The Southwestern willow flycatcher (SWFL) is typically found in mixed native and exotic riparian vegetation, generally dominated by cottonwood, coyote willow, tamarisk, and Russian olive.

The Moab Field Office committed to the Service in the 2005 to survey the riparian areas assessed in 2005 as suitable SWFL habitat but not yet surveyed. All these areas were surveyed in 2006. Migrant SWFL detections on the first and second surveys were located in the Spring Canyon area (2006) and again in 2012 during first season surveys. All other areas had no detections. No nesting SWFLs have been located to date in the Moab Field Office.

In an on-going effort to assess SWFL habitat and occupancy, the Moab BLM continues to implement SWFL habitat evaluations and complete protocol surveys in suitable habitats throughout the entire Moab Field Office. The Moab BLM monitors high potential areas along the Colorado, Green and Dolores Rivers in coordination with the Utah Division of Wildlife and with Bill Sloan of Canyonlands National Park.

Portions of two additional routes are within 0.25 miles of the Colorado River, where suitable SWFL habitat exists and migrant SWFLs have been documented.



The riparian habitat found along the following routes has been determined to contain the vegetative density and water regime necessary to support SWFL's breeding and nesting needs: Behind the Rocks (Upper Hunter Canyon), Dolores Triangle (Cowskin Canyon), Hey Joe (Spring Canyon), Hole in the Rock (Lake Canyon), Kane Creek Canyon, Top of the World (Onion Creek) or the additional Day Canyon or Jackson Hole routes. Surveys for SWFL will continue as required.

*Endangered Fish:*

Four species of endangered fishes (razorback sucker, Colorado pikeminnow, bonytail chub, humpback chub) are present in the Green, Colorado and Dolores River, though the humpbacked chub is not known to reside in the Moab FO. Critical habitat for two of these fish (Colorado pikeminnow, razorback sucker) includes the rivers and their 100-year floodplains. Routes adjacent to these rivers, or to important tributary drainages of these rivers, include Crystal Geyser, Dolores Triangle, Dome Plateau, Hey Joe, Kane Creek Canyon, Moab Rim, Pritchett Canyon, Top of the World and the additional Day Canyon, Deadman Point, Hook and Ladder/Cameo Cliffs and Fisher Valley routes.

*Gunnison sage-grouse:*

Habitat for the candidate Gunnison sage-grouse is located adjacent to the Behind the Rocks, Flat Iron Mesa, Strike Ravine, Top of the World routes and the additional Hook & Ladder and Cameo Cliff routes. No Gunnison sage-grouse have been sighted in fifteen years within the Moab Field Office.

***Utah BLM State Sensitive Species***

Utah BLM State Sensitive Species that could be found in the vicinity of Jeep Safari routes include the white tailed prairie dog, ferruginous hawk, burrowing owl, and flannelmouth sucker. Other wildlife species present near some Jeep Safari routes include bald eagle, desert bighorn sheep, American pronghorn, elk and mule deer.

*Flannelmouth sucker:*

The flannelmouth sucker is found in the Colorado, Green and Dolores Rivers. Routes adjacent to these rivers or to important tributary drainages of these rivers include Crystal Geyser, Dolores Triangle, Dome Plateau, Hey Joe, Kane Creek Canyon, Moab Rim, Pritchett Canyon, and Top of the World.

*White Tailed Prairie Dog:*

Approximately 3.5 miles of a segment of the Dome Plateau route passes within 0.5 mile of white tailed prairie dog habitat, and 1.75 miles of the same route are located 0.5 mile from a prairie dog town active in 2002. The presence of active prairie dog towns means that prairie dogs themselves may be on the Dome Plateau road.

*Bald Eagle:*

During the summer months, bald eagles forage up and down the Colorado and Green Rivers. Four known nesting territories have been established within the Moab Field Office; all three of which were active in 2012, and two were successful. The nests are 4 – 10 miles from the Dolores Triangle route. Winter roost sites, areas protected from harsh weather and human

disturbance, provide food sources for wintering eagles and are important for their winter survival. Winter roost sites occur in the vicinity of the following Jeep Safari routes: Dolores Triangle, Dome Plateau, Flat Iron Mesa, Gold Bar Rim, Steel Bender, and Top of the World.

*Ferruginous Hawk:*

Ferruginous hawk habitat is located throughout the Cisco desert. A small portion of the Dome Plateau route passes through this habitat. No known nest sites have been documented within one mile of the Dome Plateau route.

*Burrowing Owl:*

Jeep Safari routes in their entirety are in burrowing owl habitat, but there are only two known nest sites, one within 0.5 mile of the Behind the Rocks route and one within 0.5 mile of the Dome Plateau route. Burrowing owls tend to occupy abandoned ground dwelling animals' burrows (such as prairie dog and ground squirrel holes).

***Migratory Birds***

A variety of migratory song bird species may use the Moab FO for breeding, nesting, foraging, and migratory habitats. Migratory birds are protected under the Migratory Bird Treaty Act of 1918 (MBTA). Unless permitted by regulations, the MBTA makes it unlawful to pursue, hunt, kill, capture, possess, buy, sell, purchase, or barter any migratory bird, including the feathers or other parts, nests, eggs, or migratory bird products. In addition to the MBTA, Executive Order 13186 sets forth the responsibilities of Federal agencies to further implement the provisions of the MBTA by integrating bird conservation principles and practices into agency activities and by ensuring that Federal actions evaluate the effects of actions and agency plans on migratory birds.

A Memorandum of Understanding (MOU) between the BLM and USFWS (BLM MOU WO-230-2010-04) provides direction for the management of migratory birds to promote their conservation. At the project level, the MOU direction includes evaluating the effects of the BLM's actions on migratory birds during the NEPA process; identify potential measurable negative effect on migratory bird populations, focusing first on species of concern, priority habitats, and key risk factors. In such situations, BLM will implement approaches to lessen such take. Identifying species of concern, priority habitats, and key risk factors includes identifying species listed on the USFWS Birds of Conservation Concern (BCC) that are most likely to be present in the project area and evaluating and considering management objectives and recommendations for migratory birds resulting from comprehensive planning efforts, such as Utah Partners in Flight American Landbird Conservation Plan. The Utah Partners in Flight (UPIF) Working Group completed a statewide avian conservation strategy identifying "priority species" for conservation due to declining abundance distribution, or vulnerability to various local and/or range-wide risk factors. One application of the strategy and priority list is to give these birds specific consideration when analyzing effects of proposed management actions and to implement recommended conservation measures where appropriate.

The UPIF Priority Species List, the BCC list for Region 16 (Colorado Plateau) and the Utah Conservation Data Center database were used to identify potential habitat for priority species that could utilize habitats within the Moab FO. Tables 3.4 and 3.5 report this information.

**Table 3.4: Moab UPIF & FWS BCC Species 2008 (Regions 16) Found in the Project Area†**

Species	BCC§	UPIF‡	DWR Habitats†	1st Breeding Habitat‡	2nd Breeding Habitat‡	Winter Habitat‡
American Avocet		X	Critical	Wetland	Playa	Migrant
<i>Bald Eagle</i>	X		Winter	Lowland Riparian	Agriculture	Lowland Riparian
Band-tailed Pigeon			Critical/ Substantial	Ponderosa pine	Mixed conifer	Migrant
Black Rosy-finch	X	X	Substantial/ Critical	Alpine	Alpine	Grassland
Black-necked Stilt		X	Critical	Wetland	Playa	Migrant
Black-throated Gray Warbler		X	Prime Breeding	Pinyon- Juniper	Mountain Scrub	Migrant
<i>Bobolink</i>		X	Prime Breeding/Winter	Wet Meadow	Agriculture	Migrant
Brewer's Sparrow	X	X	Critical/High	Shrubsteppe	High Desert Scrub	Migrant
Broad-tailed Hummingbird		X	Critical/ Substantial	Lowland Riparian	Mountain Riparian	Migrant
<i>Burrowing Owl</i>	X		Primary Breeding	High Desert Scrub	Grassland	Migrant
Cassin's Finch	X		Critical/Substantial	Aspen	Sub-Alpine conifer	Lowland Riparian
<i>Ferruginous Hawk</i>	X	X	Prime Breeding	Pinyon- Juniper	Shrubsteppe	Grassland
Flammulated Owl	X		Critical	Ponderosa pine	Sub-Alpine conifer	Migrant
Gambel's Quail		X	High	Low Desert Scrub	Lowland Riparian	Low Desert Scrub
Golden Eagle	X		Critical/High	Cliff	High Desert Scrub	High Desert Scrub
Grace's Warbler	X		Critical	Ponderosa pine	Mixed conifer	Migrant
Gray Vireo	X	X	Prime Breeding/Winter	Pinyon- Juniper	Oak	Migrant
<i>Greater Sage-grouse</i>		X	Historical/Potential	Shrubsteppe	Shrubsteppe	Shrubsteppe
<i>Gunnison Sage-grouse</i>	X		Historical/Potential	Shrubsteppe	Shrubsteppe	Shrubsteppe
Juniper Titmouse	X		Critical/High	Pinyon- Juniper	Pinyon- Juniper	Pinyon- Juniper
<i>Lewis's Woodpecker</i>	X	X	Prime Breeding	Ponderosa pine	Lowland Riparian	Oak
<i>Long-billed Curlew</i>	X	X	Substantial/Prime Breeding	Grassland	Agriculture	Migrant
Peregrine Falcon	X		Prime Breeding	Cliff	Lowland Riparian	Wetlands
Pinyon Jay	X		Critical/High	Pinyon- Juniper	Ponderosa pine	Pinyon- Juniper
Prairie Falcon	X		Critical/High	Cliff	High Desert Scrub	Agriculture

Sage Sparrow		X	Critical	Shrubsteppe	High Desert Scrub	Low Desert Scrub
Southwestern Willow Flycatcher**	X		Migrant			
Snowy Plover	X		Critical	Playa	Playa	Migrant
Three-toed Woodpecker		X	Winter	Sub-Alpine Conifer	Lodge-pole pine	Sub-Alpine Conifer
Verry	X		High	Lowland Riparian	Lowland Riparian	Migrant
Virginia's Warbler		X	Prime Breeding/Winter	Oak	Pinyon-Juniper	Migrant
Willow Fly-catcher	X		Migrant	Lowland Riparian	Mountain Riparian	Migrant
Yellow-billed Cuckoo**	X	X	Not Known	Lowland Riparian	Agriculture	Migrant

"‡Utah Partners in Flight Avian Conservation Strategy Version 2.0 (Parrish et al., 2002), §Birds of Conservation Concern 2008 (USFWS, 2008)

†Utah Conservation Data Center, \*\*, \*\*=Federally Listed,

*Italic*=Utah BLM Sensitive Species"

**Table 3.5 Raptor Species with Potential to Occur in Moab Field Office**

Common Name	Scientific Name	General Habitat and Potential in Project Area†
Sharp-shinned Hawk	<i>Accipiter striatus</i>	Low potential to nest in pinyon-juniper woodlands. Low potential to forage in desert shrub and pinyon-juniper woodlands.
Cooper's Hawk	<i>Accipiter cooperii</i>	Low potential to nest in pinyon-juniper woodlands. Moderate potential to forage in pinyon-juniper woodlands.
Golden Eagle**	<i>Aquila chrysaetos</i>	Commonly nests on cliff ledges and rock outcrops. Moderate potential to forage in desert shrub and pinyon-juniper woodlands.
Bald Eagle	<i>Haliaeetus leucocephalus</i>	Winter habitat typically includes areas of open water, adequate food sources, and sufficient diurnal perches and night roosts. Low No potential for nesting and low potential for roosting.
Burrowing Owl		Low potential to nest in the project area due to lack of n prairie dog colonies in the area. Commonly utilizes prairie dog burrows for nesting.
Long-eared Owl	<i>Asio otus</i>	Low potential to nest in pinyon-juniper woodlands. Moderate potential to forage in desert shrub and pinyon-juniper woodlands.
Great-horned Owl	<i>Bubo virginianus</i>	Cliff ledges, pinyon-juniper, or nests of other species. Moderate potential to forage in desert shrub and pinyon-juniper woodlands.
Mexican Spotted Owl (MSO)**	<i>Strix occidentalis lucida</i>	Various forest types and steep rocky canyons, this last habitat being the primary habitat used in Utah. No potential for nesting, low to no potential for foraging due to lack of suitable nesting habitat in the area.
Ferruginous Hawk	<i>Buteo regalis</i>	Commonly nests on ground, in pinyon-juniper woodlands, and on rock outcrops. Low potential to forage in desert shrub and pinyon-juniper woodlands.

Red-tailed Hawk	<i>Buteo jamaicensis</i>	Moderate potential to nest on cliffs and low potential to nest in pinyon-juniper woodlands. High potential to forage in desert shrub and pinyon-juniper woodlands.
Swainson's Hawk	<i>Buteo swainsoni</i>	Not likely to nest in the project area. Low potential to forage in desert shrub and pinyon-juniper woodlands.
Northern Harrier		Moderate potential to forage and nest in sagebrush/grassland vegetative community and desert scrublands. Low potential to nest in pinyon-juniper woodlands. Utilizes open habitats such as marshes, fields, and grasslands.
Prairie Falcon	<i>Falco mexicanus</i>	High potential to nest on cliffs and ledges. Moderate potential to forage in desert shrub moderate in pinyon-juniper woodland.
American Kestrel	<i>Falco sparverius</i>	Moderate potential to nest on cliffs, and ledges. Moderate potential to forage from cliffs and ledges and low potential in desert shrub and pinyon-juniper woodland.

†Utah Conservation Data Center, \*\*=Federally Listed, *Italic*=Utah Sensitive Species"

## **General Wildlife**

### *Golden Eagle:*

Short segments of the following four routes pass within less than one mile of golden eagle nesting territories: Dolores Triangle, Metal Masher, Secret Spire, and Sevenmile Rim.

### *Desert Bighorn Sheep:*

Eighteen original route segments are within bighorn sheep habitat, including those on 3D, Behind the Rocks, Chicken Corners, Cliff Hanger, Crystal Geyser, Flat Iron Mesa, Gold Bar Rim (including Long Canyon), Golden Spike, Hell Roaring Rim, Hey Joe Canyon, Kane Creek Canyon, Lockhart Basin, Metal Masher, Poison Spider, Pritchett Canyon, Secret Spire, Sevenmile Rim, and Wipeout Hill as well as portions of two new routes (Day Canyon and Deadman Point). A water catchment was installed in 1984 for the bighorn sheep inhabiting Long Canyon.

GPS collar data that the DWR and the Moab BLM has collected from 2003 through 2011 has aided the BLM in identifying areas that are consistently used during the lambing season by ewes. Approximately 36 miles of segments on seven original routes pass through crucial lambing grounds for bighorn. Lambing season is April 1 to June 15. These routes include Crystal Geyser, Gold Bar Rim (which includes Long Canyon), Hell Roaring Rim, Hey Joe Canyon, Metal Masher, Secret Spire, and Sevenmile Rim. New additions that traverse through these important habitats include a portion of the 3D and 7-mile Rim additions and the two new routes, Deadman Point and Day Canyon.

### *Deer and Elk:*

Five routes pass through crucial winter range for deer and elk, including the Dolores Triangle, Flat Iron Mesa, Strike Ravine, and Top of the World routes, and the far southeast portion of the Behind the Rocks route. Portions of the new Cameo Cliffs/Hook and Ladder route and all of the Polar Mesa route pass through crucial winter range This winter habitat is generally used from

November until April. This important habitat provides winter forage, thermal cover, and protection during the stressful winter months when food sources can become limited and climatic effects make survival difficult.

#### *American pronghorn:*

Segments on twelve routes and two additional routes (3D and Hook and Ladder) pass through yearlong American pronghorn habitat.—A small segment of Hook and Ladder passes through crucial pronghorn kidding grounds. The routes in yearlong habitat include 3-D, Behind the Rocks, Copper Ridge, Crystal Geyser, Dome Plateau, Gold Bar Rim (which includes Long Canyon), Hell Roaring Rim, Hey Joe Canyon, Metal Masher, Secret Spire, Seven Mile Rim, and Wipeout Hill. This habitat provides year-round forage, in addition to water and escape terrain for the Cisco pronghorn herd. These routes are located near the edge of their habitat. The crucial kidding grounds are generally located north of the routes.

## **4.0 ENVIRONMENTAL IMPACTS**

### **4.1 Introduction**

This section details the environmental impacts to resources expected to occur as a result of the Proposed Action and No Action alternatives. The Proposed Action includes the stipulations agreed to by the permittee (see Appendix A).

### **4.2 Direct and Indirect Impacts**

Direct and indirect impacts to recreation, riparian, socioeconomics, wilderness characteristics and wildlife from permitted motorized users are limited in scope because all the permitted motorized activities take place on designated routes. All of the routes in the Proposed Action were designated for motorized travel in the 2008 Moab Resource Management Plan. Permit stipulations specify that all participants are required to stay on authorized routes. As a result, surface disturbance attributable to the use of roads during permitted activities is negligible. The direct and indirect impacts to various resources from the issuance of SRPs for motorized use, including organized group and commercial use, are detailed below.

#### **4.2.1 Alternative A – Proposed Action**

##### **4.2.1.1 Recreation**

Jeep Safari participants report a high level of pleasure and enjoyment as a result of their participation in the event. Many participants return year after year, often travelling from great distances. Scoping letters and comments on the EA report the benefits derived by the participants, including bringing people together, family bonding and an opportunity to learn lessons about the environment and the great outdoors. Participants report their happiness at being exposed to the scenery along the routes, and many state that they would be unable to see this type of scenery by any other means because of their disabilities. In addition, BLM staff in the field during the event have collected many similar positive comments from the “guests” of the Red Rock Four Wheelers during the Jeep Safari event.

A study conducted by Utah State University of 1997 Jeep Safari participants (Blahna, Reiter and von Koch, 1998) found that participants engage in the experience to see exhilarating scenery and new landscapes and to socialize with friends and family. While driving on challenging routes

was ranked highly, thrill-seeking ranked last in the eight categories offered to those filling out questionnaires.

Similarly, other organized group event participants do so because of the recreation benefits derived. Commercial passengers derive enjoyment of their public lands from their four wheel drive tours. It is highly unlikely that many of these people (particularly those with disabilities) would be able to experience the backcountry without the use of motorized tours and/or events. Thus, allowing permitted motorized use provides recreation benefit to the users, both event participants and commercial passengers.

The addition of 152 miles of designated route to the list of permitted routes would provide additional benefits to clients of permittees. Some of the new routes provide easier jeeping routes, enabling those with stock vehicles or with less experience to enjoy the backcountry. The addition of designated portions of already-permitted Jeep Safari routes to the permit would allow permittees to do some of the same portions of route that the rest of the public uses (for instance, Jeep Safari participants could go on Hell's Gate, which is currently not on the list of permitted routes). Some of the new routes offer spectacular vistas (such as Day Canyon Point), or allow people to see a new part of the Field Office (such as the Hook and Ladder/Cameo Cliffs area, a Special Recreation Management Area managed for motorized use). It is unlikely that many of the newly requested routes would become overly popular with the motorized public, because they are too easy and too far from town.

Monitoring of recreation use occurred from 2001 to 2012 on seventeen of the Jeep Safari routes (3D, Behind the Rocks, Cliffhanger, Fins and Things, Gold Bar Rim, Golden Spike, Hell's Revenge, Hey Joe, Kane Creek Canyon, Moab Rim, Metal Masher, Poison Spider, Pritchett Canyon, Rose Garden Hill, Sevenmile Rim, Steel Bender and Top of the World). Since 2005, seven of the Jeep Safari routes have been exclusive use (that is, open only to Jeep Safari participants for those days on which Jeep Safari used the route). In addition, three of the routes have been designated as one-way for the length of the Safari. Routes have been monitored before, during and after Easter week. BLM Jeep Safari monitoring reports found no off-route motorized use associated with any registered Jeep Safari participant from 2005 to 2011.

In addition to BLM monitoring, the Red Rock 4-Wheelers have instituted a system for implementing the exclusive use and one way routes during the event. The Club requires each of these 10 routes to be signed and staffed during Club runs. This enables club representatives to speak to other members of the motorized public to help increase understanding of responsible use of public lands.

The imposition of the exclusive use system has decreased indirect impacts such as route widening because the crowds of users cannot congregate on the exclusive use Jeep Safari routes. In addition, since non-motorized users are not excluded, the exclusive use Jeep Safari routes provide an opportunity for non-motorized users to enjoy an un-crowded route. For example, bicyclists wishing to avoid many motorized vehicles on Poison Spider could bike that route on a Jeep Safari exclusive use day, thus avoiding all but the 40 or so registered vehicles on that day. (Prior to exclusive use being instituted in 2005, over 800 vehicles were counted on the Friday of Easter Week on Poison Spider).

Three routes are one-way during Safari; this stipulation has bettered conditions as route widening due to passing has diminished due to the lack of two way traffic. On one of the routes, Hell's Revenge, the one-way regime has been made year-round. This lessens the impacts on the adjoining land from vehicles passing each other. In addition, one way travel has the effect of making a route seem less crowded as all the vehicles go in the same direction.

Motorized use of all routes and the correspondent user conflict with nonmotorized users increase greatly during Easter week. As noted before, "Easter in Moab" brings crowds of motorized users; fewer than 10% of these people are associated with Jeep Safari. Motorized use on the routes sampled during Easter week was almost eight times as high compared to pre-Easter week use, and almost nine times as great as the week after Easter. Motorized use dominates non-motorized use during Easter (60% of use is motorized), but not during pre- (32% motorized) or post-Easter week (24% motorized). For example, monitoring data from the Cliffhanger route show the following:

- a) pre-Easter week: = 1 motorized user and 53 nonmotorized users;
- b) Easter week = 91 motorized (25 were permitted users) and 49 nonmotorized users;
- c) post-Easter week = 12 motorized and 74 nonmotorized users.

The date on which Easter falls varies from year to year. Easter can occur as early as March 21 and as late as April 25. The exact date on which Easter occurs makes no difference in motorized usage. For example, motorized use during Easter week 2002 (held in late March) was almost five times greater than motorized use during the same week in 2003, when Easter occurred in mid-April. Clearly, the impacts from motorized use to nonmotorized users increase during Easter week, whenever that week happens to fall.

Monitoring indicates that most route users during Easter week are not registered Jeep Safari participants. During the nine-day 2004 Easter period, less than 8% of all full-sized vehicles on the routes monitored intended to participate in any Jeep Safari trip. In 2005, the corresponding figure was just over 2%. This drop can be attributed to poor weather in 2005, which caused the cancellation of several scheduled trips on pre-planned monitoring dates. (It should be noted that only Jeep Safari routes were chosen for monitoring; venues such as Potato Salad Hill were not monitored because they are not permitted locations.) Some motorized users were unaware that there was a permitted event (Jeep Safari), even though some of these visitors had been coming to Moab for motorized Easter activities for a decade or more. Other motorized users expressed resentment against Jeep Safari trips causing congestion on "their" routes. In conclusion, Easter in Moab has become a motorized "scene" in which many enthusiasts wish to participate. The permitted event, whose user days have declined since 1999, is only a small contributor to user conflicts between nonmotorized and motorized users.

Although permitted use of motorized routes represents a very small percentage (around 1%) of total visitation, it is possible that permitted events and tours may attract some new motorized users to the area. These participants could return to engage in motorized recreation use at other times during the year and/or tell friends about motorized recreation opportunities in the Moab Field Office area. Jeep Safari routes will see some small incremental increased motorized use as a result of permitted use. Education and responsible use stipulations in place will help lessen this



potential impact as those users will be told the importance of staying on designated routes and causing no new surface disturbance. That is, by being introduced to motorized use in Moab as a permitted user, it is more likely that this person will become a responsible private user.

By directing motorized use to the proposed 782 miles of Jeep Safari routes in the Moab Field Office, user conflict should be lessened, as motorized users will tend to be concentrated on these routes. This means that non-permitted routes are more likely to be uncongested by motorized use, and thus more attractive to nonmotorized users. For instance, non-Jeep Safari backcountry routes (legally open to motorized travel) would be desirable for equestrian use if the volume of motor vehicle traffic remains at lower levels.

Impacts to nonmotorized boaters in Labyrinth Canyon were also monitored. In 2001, the Hey Joe Canyon route was monitored pre-, during and post-Easter week. A total of four canoes floated by the route on the three days chosen for monitoring, 2 pre-Easter week, 1 during, and 1 post-Easter week. Vehicle counts during those three days are: 0 vehicles pre-Easter week, 40 (all Jeep Safari vehicles) during and 1 vehicle post-Easter week. Thus, the occupants of one canoe were subject to potential conflict during the 2001 Jeep Safari. In 2002, the Hey Joe Canyon route was monitored during Jeep Safari only. There were zero canoes on the river that day. Impacts to boaters from permitted use on Hey Joe are expected to be minimal due to the very low use of this Jeep Safari route. Anecdotal evidence indicates that the motorized users on Hey Joe most likely to detract from the canoeing experience are motorcycle users (because of the greater noise made by motorcycles).

Impacts from an overall increase in permitted motorized use, as outlined in the proposed action, could potentially increase user conflict as more vehicles could be encountered on Jeep Safari routes. However, an increase in the number of permitted organized events is not expected to result in substantially increased vehicle counts, since the great majority of these visitors already come to Moab to engage in motorized recreation. An increase in commercial permits could, however, result in additional vehicles encountered on Jeep Safari routes, as many of the clients would not be driving these routes on their own. It should be remembered that motorized tour vehicles often hold up to 9 people, which would help temper impacts from vehicle numbers.

#### **4.2.1.2. Riparian Resources**

The proposed action projects an additional 1-2 % total use on the requested designated routes. Impacts to riparian resources from existing motorized use, even on designated routes, can include removal/ destruction of riparian vegetation and destabilizing stream banks at difficult crossings and especially during high stream flow conditions. However, impacts from the proposed action on riparian resources would not be measurable or noticeable, due largely to design features and the small amount of use that permits add to general vehicle use.

This proposal may add vehicle use (up to 1%) during potentially high stream flow conditions to the Kane Creek Route and the Dolores Triangle Route, which are at risk during high water. The Dolores Triangle Route is maintained by the Grand County Road Department. This keeps the Dolores River crossing in relatively good condition, minimizing potential for route widening as vehicles avoid obstacles such as steep banks or mud holes. Impacts to the riparian resources and stream bank stability at the proposed Dolores River crossing would occur only if the crossing has

been washed out by a recent flood or high water conditions. Avoiding this stream crossing when the crossing is washed out would be a reasonable measure, eliminating any potential impacts to riparian resources. When water flows in the Dolores River exceed 200 cubic feet per second, the crossing is not possible and the Jeep Safari trip is cancelled or rerouted to avoid crossing the Dolores River.

The designated Kane Creek Route is subject to high stream flow conditions in the spring due to snow melt in the La Sal Mountains as well as flash flood events throughout the year. Eleven miles of this route are unmaintained and may be challenging during high water conditions. Vehicle use during high water conditions may lead to route widening as vehicles are driven around deep pools, mud holes or steep stream banks. This may reduce the riparian vegetation, cause the stream banks to become more unstable and increase erosion and sedimentation rates. Avoiding this route during flood conditions or after the route has been washed out by a major flood would minimize potential impacts to riparian resources.

In general, permitted users do not use Kane Creek during or after a major flood because their goal is to have their passengers enjoy their experience. The Kane Creek Route also has the highest density of crossings, with 60 crossings in 7 miles. Over the last 30 years the crossings in Kane Creek Canyon have become more difficult due to mud holes or steep banks. Private vehicles are often driven around these obstacles, making the crossing wider and the stream banks less stable as well as impacting riparian vegetation at these sites. This proposal includes annual route marking in Kane Creek Canyon to reduce unnecessary travel around obstacles including mud holes and steep banks. This stipulation reduces the potential for route widening and bank destabilization.

The proposed action involves using 24 designated roads that cross or travel within riparian corridors. Of the 123 total crossings on these designated roads, most are low angle and stable. These crossings do not impact riparian or stream bank conditions. These crossings are not impacted by current vehicle use and would not be impacted by the additional permitted use. The maintained B roads are kept in good condition, allowing vehicles to stay on the maintained route. Most of the unmaintained D roads are stable even without maintenance, with sandy or rocky substrates. Some unmaintained D roads can be degraded by flooding, leading to accelerated erosion. Several crossings have steep or unstable banks, especially at risk of accelerated erosion during high stream flow conditions, including crossings in Kane Creek, Tusher Canyon (Seven Mile Rim Route) and Mill Creek (Steelbender Route).

Most of the routes occurring within a riparian corridor are stable and are not impacting riparian or stream bank conditions.

Design features included in the stipulations attached to the permit:

The proposed action includes several design features to minimize impacts to riparian resources. One design feature is confirming and marking the route in Kane Creek Canyon before the Jeep Safari event, to reduce unnecessary travel around obstacles including mud holes and steep banks. Another design feature of the proposal is one-way traffic on the Kane Creek Route and the Steelbender Route (Mill Creek) during the Jeep Safari event, to reduce vehicles pulling off the

route to pass other vehicles traveling from the other direction. Vehicle size restrictions are imposed on the Seven Mile Rim Route in Tusher Wash, with no large (over 76 inches wide) vehicles on this route to reduce destabilization of the stream banks. In addition, the Dolores River crossing would not be attempted if flows exceed 200 cfs. These design features all reduce the potential for route widening and bank destabilization and associated impacts to riparian resources.

#### **4.2.1.3 Socioeconomics**

Permitted motorized use would continue to provide a contribution to the Moab economy. An increase in commercial use of Jeep Safari routes could result in increased revenues to those businesses which rely in whole or in part on permitted motorized recreation within the Moab Field Office. To the extent that these permitted activities displace other recreationists, who may have different spending profiles, the impacts described below differ.

As referred to in Chapter 3, the following analysis is based on use of the IMPLAN economic impact estimation model, described fully in Appendix E. The IMPLAN model estimates changes in employment, labor income and economic output based on spending with the affected economy, in this case, Grand County, Utah. The following analysis is based on these assumptions:

1. Changes in permitted motorized use will follow a determinable, linear pattern.
2. Spending profiles (derived from NVUM, 2007, as explained in Chapter 3) will remain constant (adjusted for inflation).
3. The underlying structure of the Grand County economy will not undergo profound changes within the next ten years.

Rather than project economic outputs for each year of the 10 year permit, the following projections are based on expected impacts in 2022, the last year of the permit. Assuming that motorized permitted use does increase at a predictable, linear rate, these impacts will be lower in earlier years of the permit.

Table 4.1 shows BLM's estimates of future permitted motorized use in the planning area, for both the Jeep Safari event and for all permitted motorized use. This analysis relies on actual data from 2000-2011, and projects use through 2022, assuming a linear growth trend. The projections are based on the MS Excel 2010 linear trend function. Figures 1 and 2 display the same data graphically.

**Table 4.1: Actual and Projected Jeep Safari and All Permitted Motorized Use, 2000-2022**

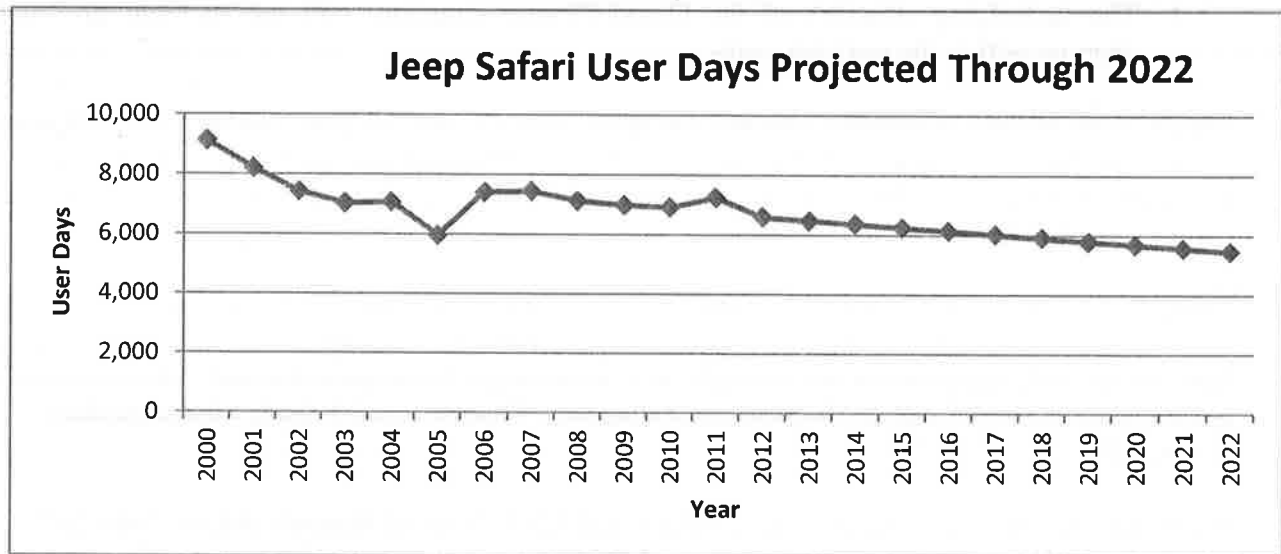
<b>Year</b>	<b>Non-Jeep Safari User Days</b>	<b>Jeep Safari User Days</b>	<b>All Motorized User Days</b>
2000	4,338	9,127	13,465
2001	5,119	8,206	13,325
2002	6,349	7,422	13,771
2003	8,560	7,035	15,595
2004	13,861	7,072	20,933
2005	11,712	5,963	17,675

2006	14,351	7,415	21,766
2007	16,742	7,439	24,181
2008	22,117	7,123	29,240
2009	15,153	6,977	22,130
2010	22,292	6,913	29,205
2011	23,066	7,236	30,302
2012	<i>25,031</i>	<i>6,587</i>	<i>31,618</i>
2013	<i>26,783</i>	<i>6,473</i>	<i>33,257</i>
2014	<i>28,536</i>	<i>6,360</i>	<i>34,896</i>
2015	<i>30,289</i>	<i>6,246</i>	<i>36,534</i>
2016	<i>32,041</i>	<i>6,132</i>	<i>38,173</i>
2017	<i>33,794</i>	<i>6,018</i>	<i>39,812</i>
2018	<i>35,547</i>	<i>5,904</i>	<i>41,451</i>
2019	<i>37,299</i>	<i>5,790</i>	<i>43,090</i>
2020	<i>39,052</i>	<i>5,677</i>	<i>44,728</i>
2021	<i>40,805</i>	<i>5,563</i>	<i>46,367</i>
2022	<i>42,557</i>	<i>5,449</i>	<i>48,006</i>

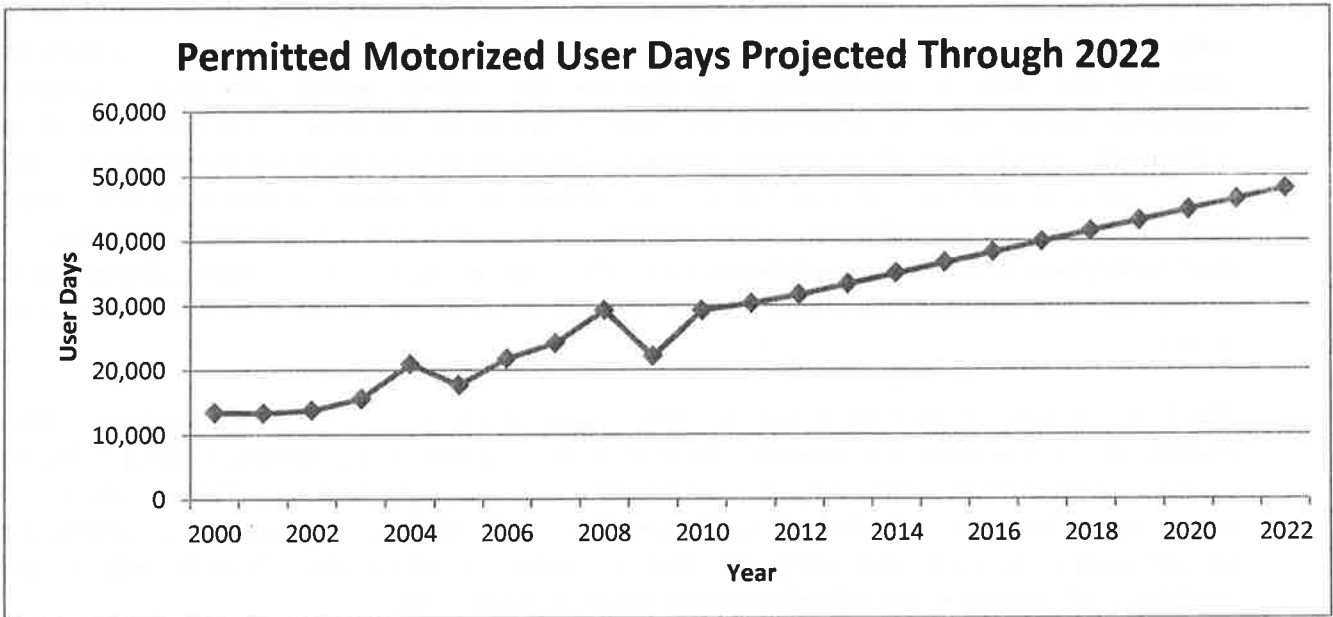
*Italics indicate estimated future usage.*

Data sources: MFO post-use reports, 2000-2011, Excel 2010 projections (2012-2022)

**Figure 1: Jeep Safari User Days Projected Through 2022**



**Figure 2: Permitted Motorized User Days Projected Through 2022**



Based on the above projections and the NVUM spending profiles described in Chapter 3, IMPLAN can project economic effects for the year 2022. This year was chosen since it would be the final year of a ten-year permit, if issued. The effects in any preceding years would likely be less, assuming that the linear growth projection proves to be accurate. Table 4.2 summarizes the IMPLAN estimates for all permitted motorized use in 2022.

**Table 4.2: All Permitted Motorized Use (2022 projected use, 2012 dollars)**

Impact Type	Employment	Labor Income	Output
Direct Effect	62.5	\$1,709,943	\$4,414,080
Indirect Effect	6.2	\$214,596	\$698,045
Induced Effect	10.9	\$384,463	\$997,466
<b>Total Effect</b>	<b>74.2</b>	<b>\$2,095,820</b>	<b>\$5,681,867</b>

At first glance, these employment and income numbers may appear low. As noted in Chapter 3, however, Grand County hosts a very large number of recreation visitors, and has a large workforce in the recreation and tourism industry. Even if overall recreation visitation to Moab BLM stays *unchanged* from 2011 to 2022 (estimated total visitation in 2011 of 1,809,702), the projected 2022 permitted motorized visitation would account for only 3.7 per cent of total visitor days. To the extent that total visitor days would increase from now until 2022, the percentage of income contributed by permitted motorized use would be even lower.

#### 4.2.1.4 Wilderness Characteristics

Within the Moab Field Office area, there is the potential for impacts to lands with wilderness characteristics because portions of seven routes (totaling 12.08 miles) are within areas determined by the BLM to possess the wilderness characteristics of naturalness, sufficient size and outstanding opportunities for solitude and/or primitive and unconfined recreation. The 2008 Moab RMP chose to manage these areas for other values, including all types of recreation.

All permitted use would be on the designated routes only; consequently, there would not be additional physical impacts to the naturalness of the surrounding area. Impacts to wilderness characteristics such as outstanding opportunities for solitude and/or primitive, unconfined recreation would only be temporary on these 12.08 miles of route, as these portions are infrequently used by permitted motorized users. Temporary impacts to nonmotorized users could occur; however, outstanding opportunities for solitude and/or primitive, unconfined recreation need not be present throughout the areas determined to have wilderness characteristics, but only need to be present somewhere within the unit. The areas in question have topography amenable to finding such opportunities within the unit even in the presence of the motorized use of these routes.

The low frequency of motorized use on these routes means that such interactions have a small likelihood of occurrence. For example, the 0.61 mile route around Hammerhead Rock is located on the Flat Iron Mesa route; very few permitted motorized users (and very few non-motorized users) utilize this area. Similarly, Day Canyon Point and Deadman Point are areas seldom used by non-motorized users and rarely travelled by motorized users; thus, there is only a small likelihood of impacts to the solitude of these non-motorized users.

#### **4.2.1.5 Wildlife, including Threatened and Endangered Species**

Disturbance is the term used throughout this section to indicate potential impacts to wildlife from human activities, including motor vehicle travel. Disturbance can cause stress, forcing animals to temporarily move from their normal habitat or abandon current habitat. If animals abandon their current habitat and are forced to utilize suboptimal habitat, that habitat may not provide needed forage and cover. Stress may result in loss of young and increased mortality of females and can reduce vitality, causing poor health or even death. Winter and early spring habitat is especially important to pregnant animals requiring food, cover and safety to ensure adequate production of young in the spring. Disturbance to migrating animals limits the ability of animals to seek food and water or to find a mate. This may cause genetic isolation and reduced viability. Disturbance to wildlife should be minimized to avoid impacts to their populations.

Potential impacts to each affected species are detailed below, followed by the stipulations developed to minimize potential impacts from the Proposed Action. For a complete list of applicant committed measures by wildlife species and route, see Appendix F.

#### ***Threatened and Endangered Species***

##### ***Mexican spotted owl***

Mexican spotted owls are particularly vulnerable to disturbance during nesting (March 1 to August 31). The MSO pair found in the Moab Field Office uses a protected canyon behind a locked gate. As a result, there are no impacts expected to currently nesting owls as a result of the Proposed Action. Foraging owls can be impacted by pursuit or excessive noise.

Applicant Committed Measures for MSO: If nesting pairs are located within 0.5 mile of a Jeep Safari route, consultation with U.S. Fish and Wildlife Service will be reinitiated. In addition, the

route **may** be closed to permitted use from March 1 through August 31. There will be no pursuit of Mexican spotted owl, and no excessive noise will be allowed in their presence.

These stipulations are expected to lessen impacts to Mexican spotted owl.

*Southwestern willow flycatcher*

Southwestern willow flycatchers are particularly vulnerable to disturbance during nesting (May 15 to July 20). No known nesting Southwestern willow flycatchers have been detected within 0.25 mile of any Jeep Safari routes, nor within the Moab Field Office. As a result, no impacts are expected to nesting Southwestern willow flycatchers. Migrating Southwestern willow flycatchers can be impacted by dispersed camping within their habitat.

Applicant Committed Measures for Southwestern willow flycatcher: If nesting pairs are located within 0.25 mile of a permitted route, consultation with U.S. Fish and Wildlife Service will be reinitiated, and the route **may** be closed to permitted use from May 1 to August 15. If Southwestern willow flycatchers are detected, dispersed camping **may** be suspended from May 1 to August 15.

These stipulations are expected to lessen impacts to Southwestern willow flycatchers.

*Endangered fish of the Colorado and Green River*

The endangered fish of the Colorado and Green Rivers, as well as the flannelmouth sucker, are vulnerable to the contaminants in motor vehicles that might find their way into the water. Permitted motorized use on the following routes could affect the water quality of associated backwaters where important fish nurseries are located if spills are not contained: Arch Canyon, Crystal Geyser, Dolores Triangle, Dome Plateau, Hey Joe, Kane Creek Canyon, Moab Rim, Pritchett Canyon, and Top of the World. In the unlikely event that motor fluids should escape into the river systems, impacts to the piscine environment could result.

Applicant Committed Measures for endangered fish: All trips on the above routes will have proper clean up supplies to contain and remove spilled vehicle fluids. Spills in dry drainages must also be contained and removed.

These stipulations are expected to lessen impacts to endangered fish.

*Gunnison sage grouse*

Gunnison sage grouse are subject to disturbance and could be impacted by dispersed camping activities, especially in occupied habitat. However, there are currently no known populations near Jeep Safari routes.

Applicant Committed Measures for Gunnison sage grouse: Should future inventory or monitoring for sage grouse identify areas occupied by the grouse, there will be no dispersed camping authorized within these occupied areas.

These stipulations are expected to lessen impacts to Gunnison sage grouse.

## ***Utah BLM Sensitive Species***

### ***White tailed prairie dogs***

White tailed prairie dogs are subject to impacts by being hit by vehicles along the Dome Plateau route.

Applicant Committed Measures for white tailed prairie dog: All vehicles will be required to observe low speeds on the Dome Plateau route to avoid direct fatality of prairie dogs.

These stipulations are expected to lessen impacts to white tailed prairie dog.

### ***Bald and golden eagles, ferruginous hawks and burrowing owls***

Bald and golden eagles and ferruginous hawks and burrowing owls are subject to disturbance and stress when pursued or from excessive noise. These birds are found throughout the Jeep Safari route system. Impacts could result from motorized vehicle use where these species may be present, especially near roosting sites.

Applicant Committed Measures for bald and golden eagles, ferruginous hawks and burrowing owls: No vehicle or foot pursuit of these birds allowed. No excessive noise in the presence of these birds.

These stipulations are expected to lessen impacts to bald and golden eagles, ferruginous hawks and burrowing owls.

### ***Migratory Birds***

An intentional take under the MBTA is the deliberate taking of migratory birds with the take as the primary purpose of an action. An unintentional take is the accidental taking of a species as a result of other management actions. No actions considered in this analysis involve the intentional take of migratory birds. This analysis would focus on the potential for unintentional take. Numerous migratory bird species may utilize the project area for a portion of the year as noted in the affected environment.

Riparian areas are essential habitat for bird species of the arid and semiarid west, including raptors, and passerine birds. Nearly all species of birds in this area depend on wetland or riparian habitats during some phase of their life cycle. Within the Moab Field Office, portions of the proposed routes are located within or cross approximately 31 miles of perennial to intermittent streams that provide some level of riparian habitat on seven routes; Bartlett Wash, Dolores River, Kane Creek, Mill Creek, Onion Creek, Ten Mile Wash tributaries, and Tusher Canyon. Bartlett Wash and Onion Creek contain county-maintained B roads. All of the proposed routes were designated in the 2008 Moab Resource Management Plan. Of the routes listed above, Kane Creek Canyon is the route that is within the riparian zone for the longest period. UPIF Priority Species and BCC species that could use these areas for nesting include the broad-tailed hummingbird, very, Lewis's woodpecker, willow flycatcher, yellow-billed cuckoo, peregrine falcon and the bald eagle.



Applicant Committed Measures for riparian areas that will protect migratory bird habitat:

- Vehicles must avoid damage to riparian vegetation and streambanks. No route widening is permitted.
- When the designated route crosses a stream, vehicles must cross in a narrow single file. The single file of vehicles must all cross in the same location to avoid widening the route.
- On designated routes located within streams and floodplains, e.g., Tusher Canyon (Sevenmile Rim), Kane Creek Canyon, Pritchett Canyon, vehicles must drive in the center of the stream channel, avoiding bank and vegetation disturbance.
- No vehicles wider than 76 inches are permitted in the 2.4 mile section of Tusher Canyon on the Sevenmile Rim route.
- If an oncoming vehicle is encountered in a narrow section of a route, vehicles will not pass each other at this point. One vehicle will reverse to a suitable, passable location.
- The 3.6 mile portion of 3-D in Tusher/Bartlett Wash (just west of Highway 191) is not available for motorized use.

These stipulations are expected to lessen impacts to the riparian habitat utilized by migratory birds.

Most of the routes traverse through desert shrub and shrubsteppe habitats intersperses with grasslands type where UPIF Priority Species and BCC species such as the sage sparrow, prairie falcon, Brewer's sparrow, burrowing owl, ferruginous hawk and golden eagles may nest. High elevation areas that also include pinion/juniper forest may also offer the black-throated gray warbler, gray vireo, juniper titmouse, and pinion jay nest opportunities. The Dolores Triangle route and the Polar Mesa addition, where ponderosa and mixed pine forest occur may offer the flammulated owl and Grace's warbler nesting opportunity.

Disturbances associated with Jeep Safari activities would present the greatest impacts to migratory birds if activities occur during the nesting season (typically May 1 through July 31). New disturbances where nesting activity is occurring may lead to nest abandonment and chick mortality if the disturbance levels exceed individual tolerances. Generally Jeep Safari routes are used continually by the general public, therefore activities on these routes would not be new disturbances and birds sensitive to disturbances would avoid them.

Disturbing activities taking place outside of the migratory bird breeding and nesting season may cause temporary, short-distance and short-term displacement that would have minimal to no impacts to birds.

All raptors (eagles, hawks and owls) are given federal protection under the Migratory Bird Act and Executive Order 13186. Extra precautions would be taken to ensure adequate protection is given to nesting raptors throughout the project area. Nesting raptors would be given both seasonal and spatial protection throughout the implementation of this project according to Service's 2002 Raptor Protection Guidelines and through the Bureau of Land Management's Best Management Practices for Raptor Protection. Individual raptors and wintering raptors and eagles may avoid areas immediately surrounding Jeep Safari routes while activities are on-going.

However, this is not likely to adversely impact raptors as adjacent areas could be used for foraging and roosting.

No new disturbance is anticipated to be created by Jeep Safari activity that may make nesting habitat undesirable by potential nesting raptors during future breeding seasons.

The following stipulations will further insure disturbances will be kept at a minimum:

Applicant Committed Measures for Raptors: Groups would avoid disturbing raptors year-round and especially during nesting seasons (March 1-August 31). During tour-stops, if newly constructed or active nests, fresh white wash, or mobbing behavior is observed, the tour group will leave the area and will not stop until they are at least one-quarter mile away. Tours will note these areas along the routes, notify the Moab BLM Field Office, and avoid stopping in these areas for the rest of the nesting season. Mobbing behavior occurs when adults protect their nest and defend their territory by flying, swooping and /or vocalizing overhead.

These stipulations are expected to lessen impacts to raptors.

### **General Wildlife**

Desert bighorn sheep, deer, elk, and pronghorn are vulnerable to disturbance during sensitive periods such as when giving birth, rearing young, or during the stress of winter. For desert bighorn, lambing occurs from April 1 to June 15; pronghorn kidding occurs from May 1 to June 15. Deer and elk are on winter range from December 1 to April 15. Desert bighorn movement in Long Canyon (part of the Gold Bar Rim route) is thought to be caused by disturbance from the large volume of traffic there. Desert bighorn sheep, deer, elk, and pronghorn can tolerate single, short-term displacement. They are more tolerant of vehicles on established roads, where vehicles can be seen or heard at a distance, than of sudden disturbances that come with less warning, such as off-route travel, horses, dogs, mountain bikes, dirt bikes, or people on foot.

Impacts to desert bighorn sheep from motorized use are considered negligible (UDWR, Bates, 2005). The number of participants in the events and on the permits constitutes only a small portion of the overall recreational use. The applicant committed measures identified in the proposed action will require that if bighorn sheep are encountered, they will not be approached either on foot or by vehicle and no undue noise would be permitted.

Concentrating use on a subset of routes, such as the Jeep Safari routes, would aid desert bighorn sheep, as they require relatively undisturbed, isolated tracts of land for maximum population viability and health. Stress, which increases susceptibility to disease, is lessened with decreased human disturbance. Studies have indicated that bighorn sheep in high human use areas utilize suboptimal habitat and have lower reproductive rates. Thus, concentrating use on the Jeep Safari routes may be helpful to desert bighorns as it leaves large tracts of land available to them.

Seven campsites have been identified for use during the Fall Campout. None of these sites are in crucial habitat for desert bighorn sheep, deer, and elk. The Golden Spike campsite, which is in Bride Canyon, is in a desert bighorn sheep habitat area. However, Bride Canyon is somewhat narrow and does not provide sufficient escape terrain and is therefore not used extensively by desert bighorn sheep. The Lockhart Basin campsite is in desert bighorn sheep habitat, but is at

least a half mile from escape terrain. The Dolores Triangle site is in deer and elk winter range; however, minimal permitted motorized use is expected during winter months as access to this area is difficult during that time.

Potential impacts to desert bighorn sheep, deer, elk, and pronghorn populations can result from pursuit and excessive noise. Potential impacts to desert bighorn sheep during lambing season can result from foot travel and camping in lambing habitat.

**Applicant Committed Measures for Desert Bighorn, Deer, Elk and Pronghorn:** No vehicle or foot pursuit of these animals will be allowed. No excessive noise will be allowed in the presence of these animals. In desert bighorn lambing areas (on portions of the Crystal Geyser, Gold Bar Rim, Hell Roaring Rim, Hey Joe, Metal Masher, Secret Spire and Sevenmile Rim routes), vehicles may not stop from April 1 to June 15. No foot travel or dispersed camping will be allowed in lambing areas.

Day Canyon Point and Deadman Point routes would be authorized only for Jeep Safari use, and not for year-round permitted use by other commercial and organized group permittees due to their proximity to prime lambing areas for bighorn sheep.

These stipulations are expected to lessen impacts to ungulates.

**Threatened, Endangered and Sensitive Plants:** Since no sensitive plants are present within Jeep Safari routes, no impacts to sensitive plants are anticipated.

#### **4.2.1.6 Monitoring and Compliance**

BLM would monitor motorized permittees for compliance with stipulations. This would include accompanying or encountering permitted trips. Compliance monitoring may include unannounced accompaniments.

#### **4.2.2 Alternative B – No Action**

All of the Jeep Safari routes (both “traditional” and new to this permit renewal) are designated for public use in the Travel Plan accompanying the 2008 Moab Resource Management Plan. That is, motorized use of these routes could occur at any time by any person with any motorized vehicle. Public use of these routes would continue even under the No Action alternative.

The exact proportion of private to permitted users is not known for all of the Jeep Safari routes. On the six routes where specific information is available, the percentage of total use represented by permitted use ranged from 0.07% to 4.4%. There is no reason to believe that the ratio of permitted to private use varies from these ranges on the remaining routes. On Hell’s Revenge, the route most heavily utilized by permitted motorized users (an estimated 40% of all permitted user days are on Hell’s Revenge), permitted use constitutes just 4.4% of total use. It is estimated that permitted use is no more than 1% of private use on designated routes. That is, private motorized use of these routes will continue under the No Action Alternative; private use may indeed increase as the opportunity to go on permitted motorized trips would be lost.

Permitted motorized use operates under stipulations prohibiting off-route travel; permittees risk the loss of their permit and/or businesses for violating this stipulation. Organized events and commercial permittees provide direction and a self-policing atmosphere which helps minimize potential environmental impacts, as guides are trained and comply with permit stipulations, including those that prohibit off-route travel. If permits were not authorized, it is probable that an increase in private motorized travel would occur; this would mean that no person or organization would take responsibility for adverse damages. Without regulated, permitted use, the potential for detrimental impacts to the environment from No Action is greater than under the proposed action. Impacts from the No Action Alternative specific to each resource are detailed below.

#### **4.2.2.2 Recreation**

Private use of Jeep Safari routes would likely increase as the opportunity to tour as part of an organized event or commercial tour would no longer be available. This increase in motorized use could accelerate user conflict. Responsible use of public lands might not be a focus of non-permitted users. Stipulations would not be provided to private users. Further, user conflict could worsen under No Action because this alternative would remove those motorized users who risk losing permits and livelihoods.

If the Jeep Safari permit were not authorized, the exclusive use and one way system would not be instituted during Easter week, the most crowded week of the year in the Moab area. The benefits to natural resources of limiting use in this fashion would be foregone. In addition, the impacts on non-motorized users could increase without the exclusive use and one way system, as the 11 most popular routes in the Moab area would have no controls on motorized use.

#### **4.2.2.2 Riparian**

Under the no action alternative, vehicle use on these Jeep Safari routes would continue at present levels. Impacts to riparian resources would continue at present levels. Ongoing impacts include loss of riparian vegetation adjacent to crossings and de-stabilization of stream banks.

Under the No Action Alternative, there would not be the opportunity to establish stipulations to protect riparian resources during periods of high recreation use. Kane Creek Canyon and Steelbender would not be a one-way route for the duration of Jeep Safari in the spring.

#### **4.2.2.3 Socioeconomics**

Not authorizing motorized permits and events would result in some loss of revenue to Grand County. Under current usage, \$1,407,539.67 would not be earned by commercial permittees. All revenues generated by permitted motorized events would be lost.

#### **4.2.2.4 Wilderness Characteristics:**

Under the No Action alternative, motorized use of these routes is not likely to decrease; potential impacts to solitude would thus not decrease. Physical impacts to wilderness characteristics might be more likely to occur as private users are more likely to travel off-route.

#### **4.2.2.5 Wildlife, including Special Status Animal Species**

Impacts to wildlife habitat from motor vehicle travel can result from drivers deviating from the established road (off-route motorized use). Off-route motorized use destroys the vegetation which provides forage for wildlife, damages burrows, and impacts habitat. Off route travel also causes wildlife disturbance, resulting in increased stress and susceptibility to disease. Removing permitted motorized use would not reduce the impacts to wildlife from off route travel.

If all motorized use on Jeep Safari routes was private use, there would not be the opportunity to establish stipulations for proper behavior when encountering wildlife.

### **4.3 Cumulative Impacts Analysis**

A cumulative impact is defined in Council on Environmental Quality (CEQ) regulations (40 CFR §1508.7) as —the impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively major actions taking place over a period of time. Past and present actions and reasonably foreseeable future actions with the potential to contribute to cumulative effects are discussed below followed by an analysis of cumulative effects. All resource values addressed in Chapter 3 have been evaluated for cumulative effects. If, through the implementation of applicant committed stipulations or project design features, no net effect to a particular resource results from an action, then no cumulative effects result.

A variety of activities, such as sightseeing, biking, camping, and hunting, have occurred and are likely to continue to occur near or within some or all of the analyzed routes; these activities likely result in negligible impacts to resources because of their dispersed nature. Other activities, such as mineral development, livestock grazing, and vegetation projects have also occurred near some or all of the routes and are likely to occur in the future. These types of activities are likely to have a greater impact on resources in the project area because of their more concentrated nature. Because these activities are occurring near the Jeep Safari routes, they have the potential to contribute to cumulative effects.

The proposed action would contribute only very marginally to these cumulative impacts by perhaps increasing visitor use on the analyzed routes. The No Action alternative would also contribute similar cumulative impacts because permitted users may very well become private users and continue to drive on the routes analyzed in this EA. The past, present, and foreseeable future actions with the potential to contribute to surface disturbance include development of new and existing mineral rights or realty actions (for example, pipeline or road rights of way) or the continuation of grazing activities.

#### **4.3.1 Recreation**

The Cumulative Impact Area is defined as the area within 500 yards of any proposed Jeep Safari route. . Permitting Jeep Safari and other commercial and organized group users of Jeep Safari routes would not add to the cumulative impacts to or for recreation. Recreation use is expected to continue at present or increased levels regardless of permitting processes. Since 99% of use is private use, the addition of permitted users to designated routes is expected to be negligible.

Permitted motorized use is not expected to affect minerals activities, which are permitted under a separate authority.

#### **4.3.2 Riparian Resources**

The cumulative impact area for riparian resources is defined as the area within 100 feet of a riparian crossing or within riparian corridor containing a travel route

Permitting Jeep Safari and other non-competitive motorized uses and events could add up to 1% of use on several routes that already have unstable riparian and streambank conditions. With the proposed design features, impacts from this additional use would not be measurable or noticeable.

#### **4.3.3 Socioeconomics**

The Cumulative Impact Area is defined as the Grand County economy. Permitting Jeep Safari and other commercial and organized group users of Jeep Safari routes would not add to the cumulative impacts to or for Socioeconomics. Economic growth is expected to continue at present or increased levels regardless of permitting processes.

#### **4.3.4 Wilderness Characteristics**

The Cumulative Impact Area is defined as the wilderness characteristics units through which Jeep Safari routes run. Permitting Jeep Safari and other commercial and organized group users of Jeep Safari routes would not add to the cumulative impacts to lands with wilderness characteristics. Motorized use of the routes within the lands with wilderness characteristics would continue to occur regardless of permitting processes. Since 99% of use is private use, the addition of permitted users to designated routes within lands with wilderness characteristics is expected to be minimal.

#### **4.3.5 Wildlife, including Special Status Species**

The Cumulative Impact Area is defined as that habitat that surrounds Jeep Safari routes. Permitting Jeep Safari and other commercial and organized group users of Jeep Safari routes would not add to the cumulative impacts to wildlife because the routes used are designated routes. Any fragmentation of habitat that would occur due to the route designation has already occurred. Applicant-committed stipulations attached to the permit are expected to mitigate effects on wildlife species. In addition, since 99% of use on designated routes is private use, the addition of permitted users (if any) to cumulative effects on wildlife is expected to be minimal.

### **5.0 CONSULTATION AND COORDINATION**

#### **5.1 Introduction**

During the preparation of this EA, many persons, groups and agencies were consulted. They are listed below.

#### **5.2 Persons, Agencies, Organizations and Groups Consulted for Purposes of this EA**

United States Fish and Wildlife Service. Consultation was initiated by the BLM on August 29,

2012. A Biological Opinion for this Environmental Assessment was issued on September 5, 2012. This Biological Opinion resulted in *Reasonable and Prudent Measures and Terms and Conditions* that are delineated in the Decision Record accompanying this EA.

State of Utah, School and Institutional Trust Lands Administration

Utah State Historic Preservation Office: The Bureau of Land Management, Moab Field Office, has initiated consultation for this Environmental Assessment with the Utah State Historic Preservation Office (SHPO). The Moab Field Office has recommended to the SHPO that the proposed action will have no adverse effect on cultural resources. The consultation letter was sent to SHPO on September 29, 2012. The Utah SHPO concurred with this finding on October 24, 2012. The concurrence letter is attached as Appendix H.

Native American consultation was initiated by the Moab Field Office on September 19, 2012. Eight tribes were consulted by the Moab Field Office: Zuni Pueblo, Hopi Tribe, Navajo Nation, Paiute Tribe, Southern Ute Tribe, Ute Indian Tribe, White Mesa Ute, and the Ute Mountain Ute Tribe. One tribe, the Hopi, responded to this letter on October 1, 2012.

### **5.3 Summary of Public Participation**

The Proposed Action was posted on the Environmental Notification Bulletin Board (ENBB) on June 1, 2011. No responses were received as a result of this posting. Scoping comments were specifically requested during a 30 day scoping period. This period was announced on the ENBB and in a newspaper article in the *Moab Times Independent* on May 24, 2012. Fifty six scoping comments were received. The scoping comments are summarized in Section 1.7 of this document.

#### **Public Comment Period on the Environmental Assessment**

A public comment period on the Environmental Assessment was held from October 26, 2012 to November 30, 2012. One organization, the Southern Utah Wilderness Alliance, received a three day extension of the comment period; its comments were submitted on December 3, 2012. This period was announced on the ENBB as well as in newspaper articles in the *Moab Times Independent* on October 25, 2012, in the *Moab Sun News* on October 31, 2012, and in the *San Juan Record* on October 31, 2012. There were 527 people and two organizations that commented on the proposed action. Of these comments, 456 were identical comments generated by a posting on the Southern Utah Wilderness Alliance webpage. These comments asked that Jeep Safari routes not be approved in lands proposed for wilderness in America's Red Rock Wilderness Bill. Six private individuals commented with various degrees of opposition to issuing the permit; some of these commenters objected only to adding new routes to the permit. Two organizations, the Canyonlands Watershed Council and the Southern Utah Wilderness Alliance, provided comments on the EA. The Canyonlands Watershed Council also stated that it supported those comments made by the Southern Utah Wilderness Council.

There were 65 private comments in support of issuing the permit; these commenters concentrated on the benefits derived from holding the event.

### 5.3.1 Response to Public Comment

See Appendix G for a summary of the public comment and the BLM's response to that set of comments.

### 5.4 List of Preparers

**Table 5.1 List of BLM Preparers**

<b>Name</b>	<b>Title</b>	<b>Responsible for the Following Section(s) of this Document</b>
Katie Stevens	Outdoor Recreation Planner	Technical coordination and quality control, Recreation, Areas of Critical Environmental Concern, Wild and Scenic Rivers, Visual Resources
Anne Marie Aubry	Hydrologist	Air Quality, Floodplains, Soils, Water Resources, Wetlands/Riparian Zones
Bill Stevens	Outdoor Recreation Planner	BLM Natural Area, Lands with Wilderness Characteristics, Environmental Justice, Socioeconomics, Wilderness/WSA
Aron King	Archaeologist	Cultural Resources, Native American Concerns
Don Montoya	Archaeologist	Cultural Resources, Native American Concerns
Becky Doolittle	Geologist	Paleontology, Geology, Wastes
Pam Riddle	Wildlife Biologist	Threatened, Endangered or Candidate Animal Species, Migratory Birds, Utah BLM Sensitive Species, Fish and Wildlife
Jordan Davis	Range Conservationist	Invasive Species/Noxious Weeds, Woodlands
Kim Allison	Range Conservationist	Livestock Grazing, Vegetation, RHS
Dave Williams	Range Conservationist	Threatened, Endangered or Candidate Plant Species
Jan Denney	Realty Specialist	Lands/Access
Jean Carson	GIS Specialist	Maps of Proposed Action



## References

Blahna, D., D. Reiter and R von Koch, *Off-Highway Vehicle Four-Wheeler Survey: A summary report of Moab Easter Jeep Safari Participants*, Utah State University, 1998.

Bureau of Land Management, Moab Field Office, *Record of Decision and Approved Resource Management Plan*, October, 2008.

Bureau of Land Management, Moab Field Office, *Riparian Database*, 2003

Bureau of Land Management, Utah State Office, IM UT 2005-091: *Utah Riparian Management Policy*, September 2005

## APPENDICES

APPENDIX A:	List of Applicant Committed Stipulations for Jeep Safari and Fall Campout
APPENDIX B:	Scoping Comments and BLM Responses
APPENDIX C:	Interdisciplinary Team Analysis Record
APPENDIX D:	Route Measurements on WSA Boundary Routes Pre- and Post-Easter, 2002 – 2005
APPENDIX E:	IMPLAN: An Input-Output Model
APPENDIX F:	Applicant Committed Measures for Wildlife Species Applied Route by Route
APPENDIX G:	Comments on the EA and BLM Responses
APPENDIX H:	SHPO Concurrence Letter

## MAPS

Map 1	“Traditional” Jeep Safari Routes, Newly Requested Jeep Safari Routes
Map 2a	Mashed Potatoes/Pickle/Tusher (additions to 3D)
Map 2b	Photographer’s Run
Map 2c	Hell’s Gate/Escalator (additions to Hell’s Revenge)
Map 2d	Rusty Nail/Where Eagles Dare (additions to Golden Spike)
Map 2e	Jackson Hole (additions to Chicken Corners)
Map 2f	Seven Mile Rim (additions)
Map 2g	Wipeout Hill (additions)
Map 2h	Copper Ridge (additions)
Map 2i	Fisher Valley to USFS Boundary
Map 2j	Day Canyon Point (Jeep Safari use only)
Map 2k	Deadman Point (Jeep Safari use only)
Map 2l	Hook and Ladder

## **Appendix A**

### **UNITED STATES DEPARTMENT OF THE INTERIOR**

#### **BUREAU OF LAND MANAGEMENT, MOAB FIELD OFFICE**

#### **SPECIAL RECREATION PERMIT STIPULATIONS for MOTORIZED USE**

##### **BLM National Terms and Stipulations**

- a. The permittee shall comply with all Federal, State, and local laws, ordinances, regulations, orders, postings, or written requirements applicable to the area or operations covered by the Special Recreation Permit. The permittee shall ensure that all persons operating under the authorization have obtained all required Federal, State, and local licenses or registrations. The permittee shall make every reasonable effort to ensure compliance with these requirements by all agents of the permittee and by all clients, customers, participants, or spectators under the permittee's supervision.
- b. A Special Recreation Permit authorizes special uses of the public lands and related waters as specified in the permit. Should circumstances warrant, the permit may be modified by the BLM at any time, including modification of the amount of use. The authorized officer may suspend or terminate a SRP if necessary to protect public resources, health, safety, the environment, or because of noncompliance with permit stipulations. Failure to comply may result in criminal, civil, and/or administrative actions (probation, suspension, cancellation). Administrative actions by the BLM to suspend or terminate a SRP may be appealed.
- c. No value shall be assigned to or claimed for the permit, or for the occupancy or use of Federal lands or related waters granted thereupon. The permit privileges are not to be considered property on which the permittee shall be entitled to earn or receive any return, income, price, or compensation. The use of a permit as collateral is not recognized by the BLM.
- d. Unless expressly stated, the SRP does not create an exclusive right of use of an area by the permittee. The permittee shall not interfere with other valid uses of the Federal land by other users. The United States reserves the right to use any part of the area for any purpose.
- e. The permittee or permittee's representative may not assign, contract, or sublease any portion of the permit authorization or interest therein, directly or indirectly, voluntarily or involuntarily. However, the authorized officer may approve contracting of equipment or services in advance, if necessary to supplement a permittee's operations. Such contracting should not constitute more than half the required equipment or services for any one trip and the permittee must retain operational control of the permitted activity. If equipment or services are contracted, the permittee shall continue to be responsible for compliance with all stipulations and conditions of the permit.

f. All advertising and representations made to the public and the authorized officer must be accurate. Although the addresses and telephone numbers of the BLM may be included in advertising materials, official agency symbols may not be used. The permittee shall not use advertising that attempts to portray or represent the activities as being conducted by the BLM. The permittee may not portray or represent the permit fee as a special Federal users' tax. The permittee must furnish the authorized officer with any current brochure and price list if requested by the authorized officer.

g. The permittee must assume responsibility for inspecting the permitted area for any existing or new hazardous conditions, e.g., route conditions, abandoned mines, landslides, avalanches, rocks, changing water or weather conditions, falling limbs or trees, submerged objects, hazardous wildlife, or other hazards that present risks for which the permittee assumes responsibility.

h. In the event of default on any mortgage or other indebtedness, such as bankruptcy, creditors shall not succeed to the operating rights or privileges of the permittee's SRP.

i. The permittee cannot, unless specifically authorized, erect, construct, or place any building, structure, or other fixture on public lands. Upon leaving, the lands must be restored as nearly as possible to pre-existing conditions.

j. The permittee, or a representative thereof, must present or display a copy of the Special Recreation Permit to an authorized officer's representative, or law enforcement personnel upon request. If required, the permittee, or a representative thereof, must display a copy of the permit or other identification tag on equipment used during the period of authorized use.

k. The authorized officer, or other duly authorized representative of the BLM, may examine any of the records or other documents related to the permit, the permittee or the permittee's operator, employee, or agent for up to 3 years after expiration of the permit.

l. The permittee shall notify the authorized officer of any accident which occurs while involved in activities authorized by this permit which results in: death, personal injury requiring hospitalization or emergency evacuation, or in property damage greater than \$2,500 (lesser amounts if established by State law). Reports should be submitted within 24 hours in the case of death or injury, or 10 days in accidents involving property damage.

## **BLM Utah Terms and Stipulations**

### **A. General**

(1) Permits issued for more than one year are subject to annual validation. To secure validation the permit holder must:

(a) have performed satisfactorily under the terms and conditions of this permit and be in conformance with applicable Federal, State, and local laws, ordinances, regulations,

orders, postings, and written requirements applicable to the area and operation covered by the permit,

(b) ensure that all persons operating under the permit have obtained all required Federal, State, and local licenses or registrations,

(c) have on file, with the office issuing the permit, current insurance identifying the U.S. Government as additional insured as specified in stipulation C, and

(d) have no outstanding, past due, or unpaid billing notices.

(2) Permittees may not leave unattended personal property on public lands administered by the Bureau of Land Management for a period of more than 48 hours without written permission of the authorized officer, with the exception that vehicles may be parked in designated parking areas for up to 14 consecutive days. Unattended personal property is subject to disposition under the Federal Property and Administrative Services Act of 1949 as amended.

(3) The permit only authorizes the use for the activity, the time(s) and in the area(s) specifically described above.

(4) The permittee must maintain on file with the BLM a current and correct list of employees who will be conducting services for the company on public land. Persons providing services under this permit must be an employee of the permittee.

(5) Placement of caches of supplies and food or equipment for future trips is not allowed unless specifically authorized.

(6) The permittee must allow BLM representatives to complete permit checks to determine the validity of the permit, ascertain the group has a copy of the permit, all required equipment, and to orient trip participants about the use of public lands and safety.

#### B. Financial

(1) All fees associated with commercial use are established by the Director, updated every three years based on the Implicit Price Deflator Index, and published in the Federal Register. Commercial use fees are based on a percentage (3% as of February, 2007) of the adjusted gross revenue derived from use authorized under the Special Recreation Permit. The minimum, non-refundable use fee is \$100.

(2) A prepayment of estimated use fees is due prior to use occurring. This amount is based on either the amount of fees paid the previous year or an annual revenue estimate agreed to by both the permittee and the authorized officer. Periodic payments are allowed if the prepayment amount due exceeds \$1,000. At least 25% of the total amount due must be paid prior to use.

(3) The permittee must submit a post use report (see attachment) thirty days after the last use of the permit in a calendar year, or as agreed upon with the field office administering the permit.

Alternative reporting arrangements may be established by written agreement with the authorized officer. An extension of this due date may be approved by the issuing office on a case-by-case basis. The report must contain a trip-by-trip log of: trip location, beginning and ending dates of each trip, number of clients, number of guides, and gross receipts for the trip. In reporting gross receipts, the outfitter will report all payments made by the customer, including trip-related equipment rental, with the only exception being retail sales of durable goods that remain the property of the customer and have an expected service life extending beyond the guided activity. Sales tax associated with gross receipts is exempt from reporting requirements. The request for deductions based on pre- and post- trip transportation and lodging expenses and percentage of time on public land, if being claimed, must also be submitted at this time. Requests for transportation and lodging deductions must be accompanied by copies of supporting receipts documenting proof of payment.

(4) The permittee must submit a Post Use Report to the authorized officer for every year the permit is in effect. If the post use report is not received by the established deadline (see Special Recreation Permit Details on page one) the following late fee schedule will be initiated:

- More than 15 days but less than 30 days after the due date: \$125
- More than 30 days after the due date, but less than 45 days: \$250

Post use reports submitted more than 45 days after the due date may result in criminal, civil, and/or administrative action to protect the interest of the United States.

(5) The permittee must maintain the following internal accounting records pertaining to the permit:

- (a) W-2 records or a similar record of employment for all employees conducting trips under the permit,
- (b) a record of all financial relationships with booking agents or advertisers,
- (c) a record of all receipts or compensation including payments, gratuities, donations, gifts, bartering, etc., received from any source on trips conducted under the permit, and
- (d) a record of all payments made by the permittee and claimed as a deduction in the permittee's fee submission.

The BLM retains the right to verify permit compliance from the books, correspondence, memoranda, and other records of the permittee, and from the records pertaining thereto of a proprietary or affiliated company during the period of the permit and for three years thereafter regardless of physical location.

### C. Insurance

(1) At a minimum, the permittee shall have in force public liability insurance in the appropriate amount as indicated in Special Recreation Permit Details on page one.

### General Guidelines for Minimum Insurance Requirements

SRP Event or Activity	Per Occurrence	Per Annual Aggregate
Low Risk: general non-competitive and non-commercial activities such as group camping, group activities, mounted orienteering, backpacking, or dog trials.	\$300,000	\$600,000
Moderate Risk: whitewater boating, horse endurance rides, OHV events, mountain bike races, rock climbing (with ropes), ultra-light outings, rodeos	\$500,000	\$1,000,000
High Risk: bungee jumping, speed record events, unaided rock climbing	\$1,000,000	\$2,000,000 - \$10,000,000

(2) The policy shall state that the insurance company shall have no right of subornation against the United States of America.

(3) Such insurance must name the United States Department of the Interior - BLM as additional insured and provide for specific coverage of the permittee's contractually assumed obligation to indemnify the United States.

(4) The policy shall stipulate that the authorized officer of the Bureau of Land Management shall be notified 30 days in advance of the termination or modification of the policy.

(5) The permit is not valid unless the permittee maintains a current authenticated certificate of the required insurance on file with the office issuing the permit.

(6) The permittee shall indemnify and hold harmless the United States against any responsibility or liability for damage, death, injury, or loss to persons and property which may occur during the permitted use period or as a result of such use.

(7) The permittee shall furnish a copy of the insurance policy directly to the authorized officer.

(8) The name of the insured on the insurance policy must be the same as the name on the permit. Those permittees holding insurance policies which only insure the permittee and not the permittee's employees must ensure that their employees also have the required insurance in effect, and that a certificate of insurance is furnished to the authorized officer.

(9) For multi-year permits, the insurance policy must be provided the first year, but on each subsequent year the authorized officer may accept a valid certificate of insurance.

(10) The insurance need only be valid during periods of actual use.

#### D. Marking of Outfitter Vehicles

Every street-legal motor vehicle used to transport clients or equipment shall be marked with at least one sign, decal, or placard on each side of the vehicle. The sign shall at a minimum include the company name and the city and state where the permittee is headquartered. Information must be readable from a distance of 50 feet.

#### E. Pre-Trip Itinerary

If required, the permittee will file a notice of intent in writing with the BLM prior to each trip. The notice of intent must specify the intended dates of the trip, number of clients, number of guides, name of the lead guide and area to be visited, including the location of camps. See Special Recreation Permit Details on page one for itinerary requirements for this permit.

#### F. Environmental and Resource Protection

All trips must conform to *Leave No Trace* principles.

- (1) For all trips and at all base camps with locations served by a motorized vehicle, the permittee must have a toilet system that allows for the proper carry-out and disposal of solid human body waste that is adequate for the size of the group and length of the trip. Toilets must be accessible for use by passengers and crew at all sites where a company motorized vehicle is present, except in developed locations where public restrooms are provided. In locations remote from a permittee's vehicle, solid human waste must be cat holed in a sunny location in bare soil or carried out (unless otherwise stipulated). Toilet paper must be carried out and not buried or burned.
- (2) Cans, rubbish, and other trash shall not be discarded, buried, or dumped on public lands or related waters. Wet garbage such as egg shells, orange peels, leftover solid food, bones, melon rinds, etc., must be carried out. Trash cleanup at campsites and day use areas will include all litter or discarded items including small items such as bottle caps and cigarette butts.
- (3) Washing or bathing with soap is not permitted in tributary streams, springs or other natural water sources. Dishwater must be strained prior to dispersal. Dishwater and bathwater may not be dumped within 100 feet of streams, springs, or other natural water sources. Only biodegradable soap may be used.
- (4) The permittee will be responsible to ensure that historical, archaeological, cultural, or ecological values are not damaged, destroyed, or removed by any participants on authorized trips. Unless specifically authorized, collection of plants, rocks, fossils, artifacts, shed antlers, animals or parts of animals is prohibited. Permits for such collecting are issued separately outside of this Special Recreation Permit.
- (5) The permittee must conduct operations authorized by the permit in accordance with applicable BLM management plans and the permittee's own operating plan submitted to the BLM in support of this permit.
- (6) The number of participants on any trip, including guides, may not exceed the number specified in the permittee's operating plan and approved permit. The exception to this requirement is over-the-road bus tours using state and Federal highway and class B county roads.
- (7) No camping is permitted within 300 feet of a known prehistoric or historic site.
- (8) No camping is permitted within 300 feet of a water source other than perennial streams unless prior authorization is received from the authorizing officer.

#### G. Fires

This permit does not waive any applicable restrictions that may affect the use of camp fires or cooking fires. The following stipulations apply unless specifically waived by the Authorized Officer:

- (1) At sites accessed by the permittee's motor vehicle(s), the permittee must provide their own fuel wood.
- (2) At sites accessed by the permittee's motor vehicle, the permittee must use a fire pan to contain the fires, ash, and charcoal. Charcoal and ash from the fire pan must be hauled out.
- (3) Gathering wood from standing trees, live or dead, is prohibited.
- (4) Use of dead and down wood is permitted only at backcountry sites not accessed by the permittee's motor vehicle. In such cases, if a fire pan is not used, burn all wood to ash and naturalize the area before leaving.
- (5) Scatter fuel wood piles before leaving the site.
- (6) Comply with all fire restrictions and orders.

#### H. Safety and Equipment

- (1) The permittee shall provide the equipment necessary to serve the public in a safe manner. The permittee will ensure that trips are conducted in compliance with all laws and regulations relating to vehicle operations, land use restrictions, food handling, and any other applicable regulations.
- (2) Every person serving as a guide on public land must at a minimum be trained and currently certified in Basic First Aid and Cardio-pulmonary Resuscitation (CPR). Each guide must have legible copies of certification cards in his/her possession while operating under a BLM Special Recreation Permit in Utah. In addition, certification cards must be filed at the permittee's headquarters and available for BLM review if necessary.
- (3) The following equipment must be carried on all commercial trips:
  - (a) A first aid kit adequate to accommodate each activity, group, or subgroup will be carried on all trips.
  - (b) Adequate repair kits and spare supplies appropriate for the trip and activity.
- (4) The following procedures must be followed on all commercial trips:
  - (a) Unless specifically authorized in the permit, discharge of firearms is allowed only for legal pursuit of game animals by a licensed hunter.
  - (b) Use of explosives and fireworks is prohibited.

#### **SUPPLEMENTAL STIPULATIONS FOR PERMITTED USE OF JEEP SAFARI ROUTES**

- (1) The authorized officer reserves the right to limit activity and group size should it become apparent that, during the term of this permit, the use is adversely impacting on the environment. The authorized officer reserves the right to close or reroute routes that have been determined to negatively impact populations of bighorn sheep or peregrine falcon nesting sites or other endangered species.
- (2) All vehicle use will be in accordance with State law and BLM off-road vehicle designations. Vehicles must stay only on routes authorized by the Special Recreation Permit. Vehicle use is not authorized in Wilderness Study Areas. No off-route travel would be permitted. To avoid damaging cultural sites that may be near the routes, the roadbed should not be widened by inappropriate passing or parking.
- (3) Permittee will be responsible for any wildfires caused by the permittee's party and will report all wildfires to the nearest BLM Field Office.



- (4) Natural disasters and uncontrollable acts present risk which the permittee assumes. The permittee has the responsibility of inspecting the camp site and immediate adjoining area for dangerous trees, hanging limbs, and other evidence of hazardous conditions and locating his camp site to avoid such hazard.
- (5) The permittee agrees to assume responsibility for public safety and health during any phase of his operation, including first aid, retrieval and evacuation activities including costs.
- (6) All refuse will be packed out and deposited in an authorized dump site.
- (7) All guides will be informed of permit stipulations. There will be a required review of stipulations of all drivers authorized under the permit.
- (8) Permittee shall not have exclusive use of recreation areas or interfere with other valid use of the public lands unless specifically authorized under the terms of the Special Recreation Permit.
- (9) All animals will be kept under control. When outside of vehicles, all domestic animals must be kept on a leash. Domestic animals must remain in the vehicle in the presence of wildlife. Harassing of wildlife and/or livestock will not be allowed.
- (10) Any paleontological and/or cultural resources (historic or prehistoric site or object) are protected and shall not be damaged or removed. All personnel associated with the permitted activity will be informed by the permittee that they are subject to prosecution for vandalizing and/or collecting any historic or prehistoric artifacts or paleontological remains. All guides will be specifically instructed in proper cultural site visitation behavior.
- (11) Any additional routes or campsites will require additional approval from BLM.
- (12) Parking and staging will be only on non-vegetated areas; parking will occur in single file along the side of the route.
- (13) Top of the World route participants will not park off the Onion Creek Road to protect the federally listed threatened plant *Cycladenia humilus* var. *jonesii*. All travel on the Onion Creek Road will be on the county-maintained road. There is no travel in the stream or in the "Narrows."
- (14) The maximum number of vehicles allowed per route per trip is as follows. No more than 25 vehicles are allowed on Dolores Triangle, and Lockhart Basin. No more than 35 vehicles are allowed on Crystal Geyser and Pritchett Canyon. No more than 40 vehicles are allowed on Kane Creek Canyon, Rose Garden Hill, Day Canyon Point (for Jeep Safari only), Hook and Ladder/Cameo Cliffs routes and Steel Bender. No more than 45 vehicles are allowed on Golden Spike, Porcupine Rim, and Secret Spire. No more than 50 vehicles are allowed on Chicken Corners, Deadman Point (Jeep Safari only), Dome Plateau, Fisher Valley, Gold Bar Rim, Hell Roaring Rim, Hey Joe, Metal Masher, Moab Rim, Photographer's Run, Sevenmile Rim, Top of the World and Wipeout Hill. No more than 55 vehicles are allowed on Cliffhanger, Copper Ridge, and Strike Ravine. No more than 60 vehicles are allowed on 3-D, Behind the Rocks, Fins and Things, Flat Iron Mesa, Hell's Revenge, and Poison Spider.

### **Wildlife Stipulations**

- (1) The permittee will be responsible for ensuring that all guides and/or group leaders will be educated about the threatened and endangered species that could be present in the activity area. This education will include the potential penalties for taking a species listed under the Endangered Species Act. See attached Threatened and Endangered Species information sheet.

- (2) Observe desert bighorn sheep, American pronghorn, deer, and elk from a distance. No vehicle or foot pursuit allowed. No excessive noise.
- (3) In desert bighorn lambing areas (see attached map) on portions of Crystal Geyser, Day Point, Deadman Point, Gold Bar Rim, Hellroaring Rim, Hey Joe, Metal Masher, Secret Spire and Sevenmile Rim, vehicles may not stop from April 1 to June 15. No foot travel, staging or camping will occur in these areas. Noise will be kept to a minimum.
- (4) Observe low speed to avoid direct fatality of prairie dogs.
- (5) Groups must avoid disturbing raptors year-round, especially during nesting seasons (March 1-August 31). There will be no stopping within ¼ mile of active raptor nests (indicated by fresh excrement and/or defensive bird behavior). An active nest site should be reported to the appropriate BLM field office.
- (6) There will be no vehicle or foot pursuit of bald or golden eagles, ferruginous hawks, or burrowing owls. No excessive noise is allowed in the presence of these birds.
- (7) If Mexican spotted owl occupancy is determined within 0.5 miles, travel shall be suspended from March 1 to August 31 while nesting birds are in the area. There will be no pursuit or excessive noise in their presence.
- (8) If Southwestern willow flycatcher breeding/nesting territories are identified along or within 0.25 miles of authorized routes, travel and camping shall be suspended within 0.25 miles of these locations from May 1 to August 15.
- (9) No camping or staging in occupied Gunnison Sage-grouse habitat. Note: there is currently no occupied habitat along Jeep Safari routes.
- (10) To avoid degradation to habitat of endangered fish, all trips on Arch Canyon, Kane Creek Canyon, Hey Joe, Crystal Geyser, Dolores Triangle, Dome Plateau, Moab Rim, Pritchett Canyon, Top of the World, and Long Canyon will have proper clean up supplies to safely clean up and prevent further contamination of the rivers from vehicle fluids. Spills in dry drainages must also be contained and removed.
- (11) Should future inventory or monitoring for sage grouse identify occupied areas, there will be no dispersed camping within these areas.
- (12) No dispersed camping will be allowed within ½ mile of wildlife water sources.

#### **Riparian/Water Quality Conservation Stipulations**

- (1) Vehicles must avoid damage to riparian vegetation and streambanks. No route widening is permitted.
- (2) When the designated route crosses a stream, vehicles must cross in a narrow single file. The single file of vehicles must all cross in the same location to avoid widening the route.
- (3) On designated routes located within streams and floodplains, e.g., Tusher Canyon (Sevenmile Rim), Kane Creek Canyon, Pritchett Canyon, vehicles must drive in the center of the stream channel, avoiding bank and vegetation disturbance.
- (4) No vehicles wider than 76 inches are permitted in the 2.4 mile section of Tusher Canyon on the Sevenmile Rim route.
- (5) If an oncoming vehicle is encountered in a narrow section of a route, vehicles will not pass each other at this point. One vehicle will reverse to a suitable, passable location.
- (6) The 3.6 mile portion of 3-D in Tusher/Bartlett Wash (just west of Highway 191) is not available for motorized use.
- (7) The unmaintained portion of the Kane Creek route will be marked annually prior to Jeep Safari week.

(8) The Dolores River crossing will not be attempted if the flow of the Dolores River exceeds 200 cubic feet per second.

**One Way and Exclusive Use Stipulations**

(1) The following routes will be one way for the entire 9 days of the Jeep Safari Event: Kane Creek Canyon, Hell's Revenge, and Steel Bender. It is the responsibility of the Red Rock 4-Wheelers to clearly sign and implement these routes as one way for the length of the Safari.

(2) BLM permittees will have exclusive motorized use of the following routes when a Jeep Safari "run" is scheduled: Behind the Rocks, Cliffhanger, Gold Bar Rim, Rusty Nail/Where Eagles Dare, Golden Spike, Moab Rim, Poison Spider, and Pritchett Canyon. For example, if a Jeep Safari run is scheduled on Behind the Rocks on April 7, only Jeep Safari and other permittees can engage in motorized travel on this route on that date.

## APPENDIX B

### Comments Received During Public Scoping Period, and BLM Responses

<b>Number</b>	<b>Scoping Comment</b>	<b>BLM Response</b>
41	Jeep Safari is a wonderful family event that promotes social bonding and allows me to enjoy my public lands.	The recreation benefits to the participants are detailed in Section 4.2.1.2
20	Jeep Safari contributes to the Moab economy	The economic benefits are detailed in Section 4.2.1.4
19	Jeep Safari teaches responsible use of public lands while four-wheeling	The responsible use education aspect is addressed in Section 4.2.1.2
8	Responsible users (such as permittees) care for the land	The burden on permittees to engage in stipulated, responsible use is discussed in Sections 4.2.1.2 and Sections 4.2.2.2
2	Jeep Safari provides access for disabled public land users	The benefits to disabled users are discussed in Section 4.2.1.2
1	Consider adding Hell's Gate, the Hot Tubs and the Escalator to the permit	The Hot Tubs are on private land and thus are not part of the permit request. Hell's Gate and the Escalator are under consideration as additions to the Hell's Revenge Jeep Safari route. See list of proposed routes
1	Permitted use is less impacting than would be the unpermitted use which would take its place	This issue is addressed in Section 4.2.2.2
1	Having a set of popular Jeep Safari routes reduces use (and impacts) elsewhere	This issue is discussed in Section 4.2.1.2
1	Permits provide fees to BLM to deal with potential effects of recreation use	The BLM acknowledges that user fees help to deal with impacts of recreation use. For instance, user fees from motorized events have been used to improve signing of routes, provide responsible parking opportunities and develop maps and trailheads to help motorized users recreate

		responsibly.
2	Jeep Safari does not abide by the rules and is not a responsible user	Both internal and external monitoring indicates that Jeep Safari does adhere to the stipulations provided in its permit. The commenter may be referring to the people who flock to Moab during Easter, only 8% of which are actually participants in Jeep Safari (see Section 4.2.1.2)
1	There is not enough Law Enforcement to control Jeep Safari	Both the BLM and Grand County have extra Law Enforcement personnel on hand during Easter (when Jeep Safari occurs). Officers report that while they do have interactions with motorized users, these users are not on Jeep Safari events.
1	Archaeological sites need to be investigated prior to issuing the permit	Cultural resources are addressed in section 1.8. Consultation with the State Historic Preservation Office was initiated on September 19, 2012. SHPO concurred with the BLM's findings on October 24, 2012. Native American Tribal consultation was also undertaken for the action; one tribe responded.
1	The purpose and need for the event must inform the public as to the BLM's purpose and need; the purpose and need should not be narrowly defined so that the proponent's route selections become the only alternative that meets the BLM's purpose and need	The purpose and need are addressed in Sections 1.3 and 1.4.
1	BLM must consider and fully analyze a range of reasonable alternatives, including those that would fully protect lands that BLM recognizes as having wilderness characteristics, as well as those that would fully protect lands within America's Red Rock Wilderness Act (ARRWA). In addition, a range of alternatives should be formulated that protect water quality, soils and soil crusts, native vegetation, riparian	<p><u>Wilderness characteristics:</u> The 12.08 miles of route traversing lands that BLM recognizes as having wilderness characteristics are analyzed in Section 4.2.1.5. All of these routes were previously analyzed as part of Travel Plan formulation in the 2008 Moab RMP.</p> <p><u>America's Red Rock Wilderness Act:</u> A wilderness characteristics inventory is the process of determining the presence or absence of wilderness characteristics. The BLM must document existing conditions as opposed to potential future conditions. The BLM may conduct the inventory using available information (e.g., existing maps, photos, records related to range projects, monitoring data) and will field check the</p>

<p>areas, cultural resources, air quality and other resources. BLM must disclose its full analyses of potential effects of all the alternatives in the EA</p>	<p>information as necessary. This wilderness characteristics inventory process directive does not mean that the BLM must conduct a completely new inventory and disregard the inventory information that it already has for a particular area. Rather, the BLM must ensure that its inventory is maintained.</p> <p>BLM's current guidance, Manual 6310 (March 2012), directs that the BLM will determine when it is necessary to update its wilderness characteristics inventory. Under the following circumstances, the BLM will consider whether to update a wilderness characteristics inventory or conduct a wilderness characteristics inventory for the first time. One condition that would lead BLM to reconsider earlier inventories would be if the BLM has new information concerning resource conditions, including wilderness characteristics information submitted by the public that meets the BLM's minimum standard described in the Wilderness Characteristics Inventory Process section of this policy.</p> <p>"The minimum standard that new information must meet in order for the BLM to consider the information during a wilderness characteristics inventory process requires a submission of the following information to the BLM:</p> <ul style="list-style-type: none"> <li>i. a map of sufficient detail to determine specific boundaries of the area in question;</li> <li>ii. a detailed narrative that describes the wilderness characteristics of the area and documents how that information substantially differs from the information in the BLM inventory of the area's wilderness characteristics; and</li> <li>iii. photographic documentation. "</li> </ul> <p>To date, the BLM has received none of this information from the proponent, and nothing to suggest that BLM erred in its original wilderness characteristics evaluations. In the absence of such information, BLM stands by its original findings of no wilderness characteristics in the lands encompassed by the proposed legislation with the exception of those lands previously determined by</p>
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		<p>BLM to possess wilderness characteristics. Additionally, all of these routes were previously analyzed as part of Travel Plan formulation in the 2008 Moab RMP. Also see Section 2.4.</p> <p><u>Water Quality:</u> The BLM undertook water quality monitoring on select Jeep Safari routes. No long term impacts to water quality were found as a result of this monitoring. See Section 1.8.</p> <p><u>Soils and Soil Crusts:</u> All proposed travel is on designated routes. Impacts to soils from designations were disclosed in the 2008 EIS accompanying the Moab RMP. Permitted use is less than 1% of all motorized use; as a result of this travel, soils are not affected to a degree where detailed analysis is necessary. Soil crusts do not grow in the prism of designated routes; thus, soil crusts are not present. See Section 1.8.</p> <p><u>Vegetation:</u> all travel is on designated routes that are devoid of vegetation. See Section 1.8.</p> <p><u>Riparian areas:</u> this resource is discussed in Section 4.2.1.2</p> <p><u>Cultural resources:</u> this resource is discussed in Section 1.8.</p> <p><u>Air Quality:</u> there is no measurable impact to Air Quality due to permitted (vs. private) motorized use. See Section 1.8.</p>
1	<p>BLM must gather and analyze empirical data and perform detailed evaluation so the impacts to natural resources, including impacts to lands with wilderness character, Areas of Critical Environmental Concern, riparian resources, water quality, wildlife and fish species, amphibians and invertebrates, soils (including erosion and fugitive dust generation), vegetation, air quality, cultural and visual resources. Impacts to other</p>	<p>Impacts to natural resources from route designation were analyzed in the 2008 Moab RMP. The Jeep Safari request is for a subset of those designated routes (782 miles of the 3,693 miles of route designated in that decision). Specific impacts to lands BLM has identified as having wilderness characteristics, riparian resources, non-motorized users, wildlife and cultural resources are discussed in the EIS accompanying the 2008 RMP, using the best available data. Should impacts to any of these resources cross a threshold, a route or a portion of a route could be denied for permitted use. It is not necessary to create an alternative to eliminate a particular route.</p> <p>Resources not impacted to a degree requiring further</p>

	users must also be analyzed	analysis are discussed in the ID Team Checklist (Appendix C) and in Section 1.8. Impacts to wilderness characteristics, riparian resources and wildlife are analyzed in Chapter 4.
1	Indirect effects, including growth-inducing effects, should be analyzed, including the likelihood that additional events would be approved. The EA must also analyze the cumulative impacts from other off-road vehicle events as well as from seismic exploration, drilling, mining and other energy-related projects, domestic livestock grazing and other impacts to the public lands managed by the BLM.	Indirect effects, including growth, are discussed in Sections 3.3.2 and 4.2.1.2. Cumulative impacts are analyzed in Section 4.3. All routes requested in the application are routes designated in the 2008 RMP. No cross country travel is requested in the proposal; thus, the impacts from other cross country use such as seismic exploration and drilling, as well as from livestock grazing, is not applicable to the proposed action..
1	The EA must include maps disclosing the proposed Jeep Safari routes in relation to lands with wilderness character (including those identified by BLM and those lands included in America's Red Rock Wilderness Act), Wilderness Study Areas (WSAs), ACECs, wildlife habitat, sensitive soils, riparian areas and streams listed on the State's 303d list of impaired waters	<p>The routes within lands BLM has identified as having wilderness characteristics are listed in Section 3.3.4. Routes in America's Red Rock Wilderness Act are discussed in Section 2.4. There are no routes within WSAs.</p> <p>Routes in ACECs, wildlife habitats and riparian areas, including those near impaired waters, are detailed in text form in the EA. Soils are discussed in Section 1.8. All data layers are available from the Moab BLM by request. It was not thought necessary to provide maps to illustrate these relationships.</p>
1	The EA must analyze and disclose the effectiveness of any proposed mitigation measures	Extensive stipulations were imposed on Jeep Safari and all permitted motorized use as part of the 2006 Jeep Safari permit renewal. Wildlife stipulations were formulated in consultation with the Utah Division of Wildlife Resources and the U.S. Fish and Wildlife Service. Monitoring of permitted users indicates that they are in compliance with these stipulations. No deleterious impacts to wildlife or other resources have been reported as a result of permitted motorized use.
1	The BLM must provide the	The best available data has been utilized in the



	<p>public with an explanation of the data and the methods used in analyzing the potential effects on lands with wilderness character, ACECs, riparian resources and water quality, wildlife and fish species, amphibians and invertebrates, soils (including erosion and fugitive dust generation), vegetation, air quality, cultural resources, visual resources and impacts on other users.</p>	<p>analysis of impacts to wilderness characteristics, riparian resources, wildlife and cultural resources as a result of permitted motorized use. Water quality monitoring was conducted before, during and after several Jeep Safari events. This monitoring showed short term increases in total suspended solids and turbidity lasting several hours and dissipating within one day. Photo plots have been established at the riparian areas with the most potential for impacts, and will be monitored long term. In addition, impacts from the designation of the routes were disclosed in the EIS accompanying the 2008 Moab RMP. Those resources that are not impacted are discussed in Section 1.8.</p>
1	<p>The Jeep Safari EA must comply with the management decisions in the Moab RMP, especially those regarding riparian management goals</p>	<p>Conformance with the Moab RMP is discussed in Section 1.5. Riparian resources are discussed in Section 4.2.1.2. Jeep Safari routes wholly within the Monticello Field Office (such as Arch Canyon, Hole in the Rock and Hotel Rock) are not analyzed in this document.</p> <p>The Moab RMP riparian decisions quoted in the respondent's letter refer primarily to designation of routes. All proposed Jeep Safari routes were designated in the RMP process. It should be noted that vehicular travel on designated routes is not defined as a surface disturbing activity (Moab RMP, page A-1). Riparian Decision #3 (page 99) states: "where necessary, control recreational use by changing location or kind of activity, season, intensity, distribution and/or duration". Restricting vehicles to one way traffic on congested trails reduces impacts from vehicles trying to pass each other in Kane and Mill Creeks. See also analysis in Section 4.2.1.2.</p>
1	<p>The BLM must include an analysis of the potential impacts of the proposal on the water quality of the streams included in the State's 303d list</p>	<p>Mill Creek and Onion Creek are both on the State's 303d list, for TDS and temperature, and have travel routes with stream crossings. Management actions recommended in the 2002 TMDL reports include improving riparian resources in both stream corridors, acknowledging the existing roads. The route in Onion Creek is a B road, maintained by Grand County. The Steelbender route is a D road in the Mill Creek area, with no maintenance, which crosses the stream 4 times. One of these crossings is steep and at</p>

		risk (Flat Pass). See Sections 1.8 and 4.2.1.2.
1	BLM must initiate consultation with SHPO and affected tribes and conduct a Class III cultural resource inventory. BLM failed to comply with the NHPA when it designated routes during the RMP and it cannot approve an SRP without complying with NHPA	The BLM has initiated consultation with SHPO and with affected tribes. Cultural resources are discussed in Section 1.8.
1	BLM should not permit vehicle use in riparian areas due to impacts such as rutting, channeling, bank deterioration, increased sedimentation and water pollution. The EA must consider reasonable alternatives to any proposed Jeep Safari routes located in riparian areas.	Twenty-four routes cross or travel within riparian areas as part of this proposal. Most of these routes do not involve rutting, bank deterioration or water pollution. Vehicular travel on designated routes is not defined as a surface disturbing activity (Moab RMP, page A-1). See also analysis in Section 4.2.1.2.

## Appendix C: INTERDISCIPLINARY TEAM CHECKLIST

**Project Title:** Special Recreation Permit for Red Rock Wheelers 4-Wheelers Jeep Safari

**NEPA Log Number:** DOI-BLM-UT-Y010-2011-0189 EA

**File/Serial Number:** MFO-Y010-11-106R

**Project Leader:** Katie Stevens

### DETERMINATION OF STAFF: *(Choose one of the following abbreviated options for the left column)*

NP = not present in the area impacted by the proposed or alternative actions

NI = present, but not affected to a degree that detailed analysis is required

PI = present with potential for relevant impact that need to be analyzed in detail in the EA

NC = (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section D of the DNA form. The Rationale column may include NI and NP discussions.

The following elements are not present in the Moab Field Office and have been removed from the checklist:  
Farmlands (Prime or Unique), Wild Horses and Burros.

Determi- nation	Resource	Rationale for Determination*	Signature	Date
<b>RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H-1790-1)</b>				
NI	Air Quality Greenhouse Gas Emissions	There are no potential impacts to Air Quality from permitted motorized uses on these routes, which are all designated in the 2008 Moab RMP Travel Plan.	AM Aubry	3/26/2012
NI	Floodplains	All travel is on existing routes designated in the 2008 Moab RMP Travel Plan. Some of the proposed routes cross or follow larger floodplains including the Dolores River, Kane Creek, Bartlett Wash and Mill Creek. Impacts to floodplains from permitted activities are minor as long as vehicles stay on existing routes and do not widen the wash crossings. These impacts are reduced in Kane Creek and Mill Creek with one way traffic restrictions.	AM Aubry	3/26/2012
NI	Soils	All travel routes were designated in the 2008 Moab RMP Travel Plan. There is no new surface disturbance associated with this proposal.	AM Aubry	3/26/2012
NI	Water Resources/Quality (drinking/surface/ground)	Monitoring indicates short term impacts to water quality following vehicles crossing streams including a rise in turbidity and Total Suspended Solids. These impacts usually last several hours and mimic minor flooding conditions.	AM Aubry	3/26/2012
PI	Wetlands/Riparian Zones	All travel is on existing routes designated in the 2008 Moab RMP Travel Plan. Some of the proposed routes cross or follow riparian zones including Kane Creek, Mill Creek and Bartlett Wash. The route with the most potential impacts from this permitted activity is Kane Creek, with over 50 creek crossings. These impacts are reduced with one way traffic restrictions.	AM Aubry	3/26/2012
NI	Areas of Critical Environmental Concern	See 2008 Moab RMP, Map 21. Routes designated within the ACECs are utilized. No additional impacts.	Katie Stevens	3/28/2012
PI	Recreation	Provides benefit to motorized users; possible conflicts with non-motorized users	Katie Stevens	3/28/2012
NI	Wild and Scenic Rivers	All travel on designated roads within suitable W&S corridors	Katie Stevens	3/28/2012
NI	Visual Resources	All travel on designated roads; no further impact to VRM.	Katie Stevens	3/28/2012

<b>Determination</b>	<b>Resource</b>	<b>Rationale for Determination*</b>	<b>Signature</b>	<b>Date</b>
NP	BLM Natural Areas	See 2008 Moab RMP, Map 16.	Bill Stevens	4/5/2012
PI	Socio-Economics	Potentially positive impact to local economy	Bill Stevens	4/5/2012
PI	Lands with Wilderness Characteristics	No impacts to naturalness; impacts to solitude could occur. Analyzed in EA	Bill Stevens	4/5/2012
NP	Wilderness/WSA	See 2008 Moab RMP, Map 23. Boundary roads have not widened into the WSA, as evidenced by monitoring.	Bill Stevens	4/5/2012
NI	Cultural Resources	All travel on designated roads; no further impact to cultural resources because all travel is limited to routes consulted on in the 2008 RMP Travel Plan. Consultation with SHPO has been initiated. See Section 1.8 for additional details.	Aron King	9/11/12
NI	Native American Religious Concerns	All travel on designated roads; no further impact to cultural resources because all travel is limited to routes consulted on in the 2008 RMP Travel Plan. See Section 1.8 for additional details.	Aron King	9/11/12
NI	Environmental Justice	No adverse impact to low income populations	Bill Stevens	4/5/2012
NP	Wastes (hazardous or solid)		Rebecca Doolittle	3/26/2012
PI	Threatened, Endangered or Candidate Animal Species	See analysis in EA	Pam Riddle	9/11/12
PI	Migratory Birds	See analysis in EA	Pam Riddle	9/11/12
PI	Utah BLM Sensitive Species	See analysis in EA	Pam Riddle	9/11/12
PI	Fish and Wildlife Excluding USFW Designated Species	See analysis in EA	Pam Riddle	9/11/12
NI	Invasive Species/Noxious Weeds	Since all travel is on designated roads, there is little chance of spreading noxious weeds	Jordan Davis	3/26/2012
NP	Threatened, Endangered or Candidate Plant Species	There are no T and E plants within the vicinity of the requested designated roads	Dave Williams	3/26/2012
NI	Livestock Grazing	All travel on designated routes that are devoid of vegetation.	Kim Allison	3/26/2012
NI	Rangeland Health Standards	All travel on designated routes that are devoid of vegetation	Kim Allison	3/26/2012
NI	Vegetation Excluding USFW Designated Species	All travel on designated routes that are devoid of vegetation	Kim Allison	3/26/2012
NI	Woodland / Forestry	All travel on designated routes that are devoid of vegetation	Jordan Davis	3/26/2012
NP	Geology / Mineral Resources/Energy Production	All travel on designated routes	R. Doolittle	3/26/2012
NI	Lands/Access	All travel on designated routes	J. Denney	3/26/2012
NP	Paleontology	All travel on designated routes	R. Doolittle	3/26/2012

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**FINAL REVIEW:**

Reviewer Title	Signature	Date	Comments
Environmental Coordinator	/s/ Kathleen C. Stevens	12/26/2012	
Authorized Officer	/s/ Jeffrey R. Smith	12/26/2012	

## Appendix D

### Route Measurements on WSA Boundary Routes Pre and Post-Easter, 2002 - 2005

Year Measured	Route and WSA	Location <sup>2</sup>	Total road width in feet	
			Pre Easter Week	Post Easter Week
2002	Moab Rim (Behind the Rocks WSA)	4 locations near WSA boundary south of private property	11.2 29 28.2 11	12.9 29 29 11.5
2002	Fins-n-Things (Negro Bill WSA)	2 locations where route intersects WSA boundary (one on pre-inventoried route)	8.75 9.16	9.9 7.25
2002	Behind the Rocks	4 locations along SE boundary of WSA	14.075 (avg)	16.225 (avg)
2003	Moab Rim	One wide spot at difficult ledge	32	47.75
2003	Fins-n-Things	2 locations where route intersects WSA boundary (one on pre-inventory route)	11.8 9.8	10.1 10.3
2003	Behind the Rocks	Road width at narrow spot on SE boundary of WSA	9.2	11.0
2004	Moab Rim	Average road width measurements on various route segments	8.0 9.0 10.0	8.0 10.0 12.5
2005	Fins-n-Things	2 locations where route intersects WSA boundary (one on pre-inventory route)	17.5 11.3	17.5 12.6
2005	Behind the Rocks	2 locations along SE boundary of WSA	11.4 35.9	13.0 35.9
2005	Moab Rim	Average road width measurements on various route segments	8.0 10.0 14.0	7.0 10.0 10.0

In addition, measurements were taken in Pritchett Canyon of the parking/view area above "Rocker Knocker". In June, 2003, this area measured 0.31 acres. In April, 2004, the area of disturbance had grown to 0.47 acres.

**Note:** In some cases, road width actually decreased. This is due primarily to spring season revegetation, as "road width" is measured by distance between visible motor-caused tracks.

<sup>2</sup> Route measurements span the entire route. These routes are primarily boundaries of the WSA; however, it is not known where the original edge of the road was. This makes it difficult to establish the exact amount of widening occurring in the WSA.

## Appendix E

### IMPLAN: An Input-Output Model

Input-output models describe commodity flows from producers to intermediate and final consumers. The total industry purchases are equal to the value of the commodities produced. Industries producing goods and services for final demand purchase goods and services from other producers. These other producers, in turn, purchase goods and services. This buying of goods and services continues until leakages from the region stop the cycle. The resulting sets of multipliers describe the change of output for regional industries caused by a change in final demand in an industry.

IMPLAN not only examines direct contributions but also indirect and induced contributions. *Indirect* employment and labor income contributions occur when a sector purchases supplies and services from other industries in order to produce their product. For example, a local restaurant may purchase food supplies from a local wholesaler. *Induced* contributions are the employment and labor income generated as a result of spending the new household income generated by direct and indirect employment. For example, employees of the restaurant and food supplies wholesaler spend part of their earnings on other locally provided goods and services (e.g., rent, entertainment, groceries for personal consumption, etc.). Among other things, IMPLAN computes values for the following:

*Employment:* The employment estimated is defined as any part-time, seasonal, or full-time job, lasting for at least one year.

*Labor income:* Labor income includes all forms of employment income, including employee compensation (wages and benefits) and proprietor income.

*Output:* Output represents the value of industry production. In IMPLAN these are annual production estimates for the year of the data set and are in producer prices. For manufacturers this would be sales plus/minus change in inventory. For service sectors output = sales; for retail and wholesale trade, output = gross margin and not gross sales.

Despite its overall usefulness for a quantitative-based analysis of impacts from changes in economic activities, IMPLAN has several limitations that need to be considered:

- As with any input-output model, the quality of the input data directly affects the quality of the output.
- IMPLAN is “static”; that is, it assumes no other changes in the regional economy above and beyond what is being measured by a particular input. It also assumes that the economy under examination will not undergo any major structural change during the period under analysis. For example, if a small rural economy becomes the site of a major auto manufacturing facility, the assumed relationships among the various actors in the local economy likely will change, and thus the model’s calculations and outputs.
- Related to the above, IMPLAN is most accurate over shorter periods of time than are often considered in BLM planning documents. Over a longer period of time, structural changes in the planning area’s economy are more likely. To the extent that such changes are significant, the accuracy of the model’s outputs declines.

- IMPLAN is a linear model; any savings in the planning area economy due to economies of scale will not be captured by the model.
- The relative ease of using IMPLAN software can disguise the economics expertise and experience usually required to construct a valid IMPLAN model.



**Appendix F**  
**Applicant Committed Measures for Wildlife Applied Route by Route**

<b>Wildlife Species</b>	<b>Habitat by Jeep Safari Route</b>	<b>Measures</b>
<b>Mexican spotted owl (MSO)</b>	Behind the Rocks, Chicken Corners, Flat Iron Mesa, Kane Creek Canyon, and Lockhart Basin. Additional routes: Deadman Point, Day Canyon, Polar Mesa, Cameo Cliffs South and Jackson Hole	If MSO occupancy is determined within ½ mile of a Jeep Safari route, no camping will be allowed and travel <b>shall</b> be suspended from March 1 to August 31. No pursuit of MSO and no excessive noise in their presence.
<b>Southwestern willow flycatcher (SWFL)</b>	Behind the Rocks, Hey Joe, Kane Creek Canyon, Lockhart Basin, Metal Masher, Steel Bender, and Top of the World. Additional routes: Day Canyon Point and Jackson Hole	If SWFL occupancy is determined within ¼ mile of a Jeep Safari route, travel <b>shall</b> be suspended within 0.25 miles of breeding areas from May 1 to August 15. No camping (except in developed campgrounds) in SWFL habitat from May 1 to August 15.
<b>Bald Eagle</b>	Behind the Rocks, Dolores Triangle, Dome Plateau, Flat Iron Mesa, Gold Bar Rim, Steel Bender, Strike Ravine, and Top of the World. Additional routes: Day Canyon, Polar Mesa and Cameo Cliffs South	No vehicle or foot pursuit of eagles. No excessive noise in the presence of birds.
<b>Bonytail chub, Colorado pikeminnow, humpback chub and razorback sucker; flannelmouth sucker</b>	Crystal Geyser, Dolores Triangle, Dome Plateau, Hey Joe, Kane Creek Canyon, Moab Rim, Pritchett Canyon, and Top of the World. Additional routes: Day Canyon, and Jackson Hole	All trips will have proper clean up supplies to safely clean up and prevent further contamination of the rivers from vehicle fluids. Spills in dry drainages must also be contained and removed.
<b>Gunnison sage-grouse</b>	Behind the Rocks, Flat Iron Mesa, Strike Ravine, Top of the World	No dispersed camping within habitat should occupation by sage-grouse occur.
<b>White tailed prairie dog</b>	Dome Plateau and 3D additions	Observe low speed to avoid direct fatality of prairie dogs.
<b>Ferruginous hawk</b>	Dome Plateau	No vehicle or foot pursuit. No excessive noise in presence of birds.
<b>Burrowing Owl</b>	All routes	No vehicle or foot pursuit. No excessive noise in birds' presence.
<b>Golden Eagle</b>	Dolores Triangle, Metal Masher, Secret Spire, Sevenmile Rim,	No vehicle or foot pursuit of eagles. No excessive noise in the

		presence of birds.
<b>Desert bighorn sheep</b>	3-D and additions, Behind the Rocks, Chicken Corners and Jackson Hole addition, Cliffhanger, Copper Ridge and additions, Crystal Geyser, Dome Plateau, Flat Iron Mesa, Gold Bar Rim, Golden Spike, Hell Roaring Rim, Hey Joe, Kane Creek Canyon, Lockhart Basin, Metal Masher, Poison Spider, Pritchett Canyon, Secret Spire, Sevenmile Rim and additions, Top of the World, Photographers Run, Rusty Nail/Where Eagles Dare, Wipeout Hill additions, Deadman Point, Day Canyon Point, Polar Mesa	Observe only from the vehicle if animals are present. No excessive noise in the presence of animals.
<b>Desert bighorn lambing</b>	Crystal Geyser, Gold Bar Rim, Hell Roaring Rim, Hey Joe, Metal Masher, Secret Spire, Sevenmile Rim Additional routes: 3D, Deadman Point, 7-Mile, Golden Spike, Photography Run & Day Canyon Point	From April 1 to June 15, vehicles may not stop in lambing areas (see map).No foot travel or dispersed camping in lambing areas.
<b>Deer and Elk</b>	Behind the Rocks, Dolores Triangle, Flat Iron Mesa, Strike Ravine, Top of the World Additional routes: Polar Mesa and Cameo Cliffs South	Observe only from the vehicle if animals are present. No excessive noise in the presence of animals.
<b>American pronghorn</b>	3-D, Crystal Geyser, Dome Plateau, Gold Bar Rim, Hell Roaring Rim, Hey Joe, Metal Masher, Secret Spire, Sevenmile Rim Additional routes: 3D & Cameo Cliffs South	Observe only from the vehicle if animals are present. No excessive noise in the presence of animals.

**APPENDIX G**  
**Public Comments and BLM Responses**

No. of comments	Comment	BLM Response
<i>Comments Emphasizing Beneficial Impacts of the Proposed Action</i>		
50	The Red Rock Four Wheelers promote responsible motorized recreation. People who learn from the club can apply these good principles to all their motorized activities. Specific instances of good practices were mentioned by many commenters.	The stipulations attached to the permit are displayed in Appendix A. These stipulations promote responsible motorized recreation. The impacts of not issuing the permit are included in Section 4.2.2.2 (No Action), where it is stated that "Responsible use of public lands might not be the focus of non-permitted users."
5	The event is superior both for its practice of responsible recreation and for the benefit it provides participants.	The recreation benefits of the event are detailed in Section 4.2.1.1.
23	The event provides economic benefits to the local economy.	The economic benefits of the event are analyzed in the EA in Section 4.2.1.3.
17	The newly permitted routes are needed to provide either easier routes, or fun challenges. New routes will disperse use to other designated routes.	The reasons why newly requested routes are included are detailed in Sections 1.3 and 2.1. The commenter is correct in that overall participation in the Jeep Safari is not expected to increase. This point has been added to the EA in Section 2.2.
17	The Jeep Safari experience brings people together, either as family, or for camaraderie. It provides lessons in concern for the environment. Several people mentioned assets of the proposed new routes by name; for example, the view at the end of Day Canyon Point.	The recreation benefits of the event are analyzed in the EA in Section 4.2.1.1. The scenic assets provided by Jeep Safari to its participants are also noted in that section. Verbiage has been added as to the benefits of permitting additional designated routes.
1	Jeep Safari is a cultural icon in and of itself. It is an event with cultural relevance and an American icon, representing freedom and the spirit of adventure.	The comment represents an opinion; the cultural relevance of the routes are mentioned in Section 1.8.3
40	The BLM should renew the Red Rock Four Wheelers' permit, as it provides an opportunity for citizens to enjoy their public lands.	The recreation benefits of the event are analyzed in Section 4.2.1.1
3	The Jeep Safari event provides access to the backcountry for	The benefit of the event to those with disabilities in mentioned in Section 4.2.1.1

	those who are disabled.	
1	Exclusive use helps other users, especially cyclists.	The benefit of exclusive use days to cyclists is mentioned in Section 4.2.1.1
1	Vehicle use numbers vary between the text (on pages 24-25) and Appendix A. New trails are not listed in Appendix A with their use limits. The Backwards Bill trail is not listed in either place. Also, Rusty Nail is not listed in Appendix A as an exclusive use trail, although it is referred to as such on page 25.	Vehicle use numbers have been corrected so that one number is reported in both places. The Backwards Bill route is not a different route, but merely a running of Seven Mile Rim in a reverse direction. For this reason, it is not listed as a separate route. The Rusty Nail (an addition to the Gold Bar/Golden Spike route) has been added to the list of exclusive use trails, as its running is dependent on those two exclusive use routes.
1	Limiting SRP use to a distinct set of routes is a responsible thing to do. This permit requests an increase of these authorized routes, which is a fair and warranted thing to do.	The EA points out that concentrating motorized use is a beneficial outcome of the process; increasing the list of permitted routes may increase permitted use on these routes. Day Canyon Point and Deadman Point would not be available for permitted use outside of the Jeep Safari event.
1	The public should be allowed access to its lands.	The BLM SRP system is one way in which the public can be assisted in enjoying its public lands.
<i>Comments Concerning Issuing a Permit in Lands within America's Red Rock Wilderness Act</i>		
457	The commenters requested that the BLM consider the SUWA Alternative (not permitting travel on roads within lands proposed for wilderness in America's Red Rock Wilderness Act). To permit travel on these routes would be to degrade opportunities for solitude and primitive recreation, especially in the Labyrinth Canyon, Day Canyon and Behind the Rocks area.	<p>The alternative of eliminating all requested routes in America's Red Rock Wilderness Act (ARRWA) is discussed in Section 2.4. All requested routes are designated in the Travel Plan accompanying the 2008 Moab Resource Management Plan (RMP). This means that it is legal for any member of the public to drive on the routes in question. The Environmental Impact Statement accompanying the RMP analyzed the use of the routes to resources, including that of wilderness characteristics. The purpose and need of the current proposed action is not to commission or decommission roads, but to allow permitted users to utilize roads that are in the designated route system.</p> <p>The lands within the ARRWA were evaluated by the BLM as part of the development of the 2008 Moab RMP. Requested routes (totally 12.08 miles) on those lands deemed by the BLM to possess wilderness characteristics are analyzed in Section 4.2.1.4. The low frequency of use on these routes means that interactions between non-motorized users and motorized users have a small likelihood</p>

		<p>of occurrence. In addition, the opportunities for solitude and/or primitive recreation need only occur somewhere within the unit; the topography of these units means that the opportunities within the unit remain, even in the presence of motorized use on the requested routes.</p> <p>It should be noted that Day Canyon Point and Deadman Point are proposed for authorization for the Jeep Safari event only, in order to minimize impacts to desert bighorn sheep. These two designated routes would not be authorized for other permitted users.</p>
1	<p>The BLM failed to comply with NEPA by not considering a reasonable range of alternatives. Specifically, it did not analyze SUWA's proposed alternatives eliminating routes in areas proposed for wilderness designation in ARRWA. Excluding the miles of route in ARRWA would eliminate only 11% of the proposed mileage. This would also decrease user conflict.</p>	<p>See response above. The routes requested are open to the public for motorized use. The proposed action would not close the routes to motorized use, but only to permitted use. SUWA's alternative is not reasonable because it eliminates the use of a designated route to one subset of motorized users. There is no reason to exclude permitted users from routes that are designated for motorized use.</p>
1	<p>Eliminating routes in ARRWA would also decrease user conflict. These are generally "low use" route (such as Dome Plateau, Hell Roaring rim, Hey Joe, Porcupine Rim, Steelbender, Rusty Nail/Where Eagles Dare, Day Canyon Point and Deadman Point).</p>	<p>The EA lists the "low use" routes. There are 17 "traditional" Jeep Safari routes that are low use routes; it is anticipated that many of the new routes would also receive very little use. Those Jeep Safari routes that have become popular are generally located very near the city of Moab, and are relatively difficult. It is not reasonable to eliminate designated routes from those allowed for permitted motorized use. Those non-motorized users who do not wish to encounter motorized vehicles may seek hiking locations that are not on a designated road.</p>
1	<p>Boundary routes along WSA boundaries are widening, as shown in Appendix D. The BLM has failed to take a hard look at WSAs.</p>	<p>Language has been added to Section 1.8.8 to clarify the meaning of the data in Appendix D. What BLM measured for the data in Appendix D was tire track to tire track. Distance between tire tracks does not always equate to road widening. Distances between tire tracks should not be equated to permanent widening (or narrowing) of roads.</p> <p>The routes in question are boundary roads. The</p>

		<p>presence of tracks off these roads is not necessarily an incursion into the WSA as the widening could occur on the non-WSA side of the boundary. When boundary routes have widened into the WSA, the BLM has instituted fencing projects to take action to minimize road widening that could impact the WSA. Several successful examples include the fencing along the Behind the Rocks route on the south boundary of the Behind the Rocks WSA, fencing along the Steelbender route on the boundary of the Mill Creek WSA, fencing in Pritchett Canyon on the boundary of the Behind the Rocks WSA and fencing along the Moab Rim, also on the boundary of the Behind the Rocks WSA.</p> <p>When the measurements shown in Appendix D were taken, these routes were neither one-way or exclusive use. BLM determined that the principal cause of road widening, where it existed, was due to vehicles passing each other. One of the purposes of the requirement for exclusive use and one-way travel was to minimize potential road widening. The exclusive use and one-way requirement is also part of the present Proposed Action. This requirement is to prevent roads from widening into the WSAs.</p>
<i>Comments Concerning the Impacts of Motorized Use on Non-Motorized Users</i>		
1	<p>The EA fails to take a hard look at the growth-inducing effects and potential changes in patterns of land use, and the likelihood that granting the Jeep Safari permit will result in the Moab Field Office approving additional SRPs in the future. Permitted user days have already increased. The EA fails to analyze the direct, indirect and cumulative impacts of the proposed new routes, which currently do not have the heavy use recorded on many of the “traditional” Jeep Safari routes.</p>	<p>The EA states that, while Jeep Safari may have put jeeping ‘on the map’ in its early days, other sources, including the internet, are what drives any growth in motorized use today.</p> <p>Growth in motorized SRPs from 2008 to present is due primarily to the fact that the 2008 Moab RMP requires groups of 25 vehicles or more to obtain an SRP from the Moab BLM (see Section 1.2). This has turned many private motorized users into permitted motorized users, rather than increase the total number of motorized users. Permitted users are required to adhere to stipulations and conditions, and do not engage in impacting cross-country travel.</p> <p>The proposed action is to allow permitted use on already designated routes. Departmental Manual 516 allows “recreation travel along roads, trails, or</p>

		<p>in areas authorized in a land use plan” to be categorically excluded from NEPA analysis, because the impacts of such an action are negligible. An EA was prepared on the permitted use of roads in the Moab Field Office so that further analysis could be undertaken. This analysis did not show impacts from travelling on a designated road.</p> <p>The newly proposed routes are designated for public use. While it is unlikely that the use of these routes would increase due to their “adoption” by the Red Rock 4-Wheelers, this would be allowable under the 2008 Moab RMP. The reason that “travel along roads, trails, or in areas authorized in a land use plan” is excluded from NEPA analysis is that the impacts of such an action are negligible.</p>
4	Motorized vehicles harm the solitude and enjoyment of non-motorized users; only 10% of visitors to Moab are here for motorized recreation). More people hike than jeep. Newly requested Jeep Safari routes would add motorized vehicles to previously unused locations.	The impacts of vehicular use on non-motorized recreationists are addressed in 4.2.1.1. All vehicle use, including that on newly-requested routes, is restricted to designated routes only. These routes are available to motorized vehicles at any time. It is unknown whether or not these newly-requested routes will see any increase in motorized use throughout the year. There are many previously-authorized Jeep Safari routes (such as Copper Ridge) that do not see large amounts of motorized use. Those non-motorized users who wish to hike undisturbed by motorized vehicles cannot expect to find solitude while hiking on a designated road.
1	Motorized users are only a part of the industry in Moab, and they should not be allowed to dislocate other users from BLM property during the spring or any other times of the year.	The impact of motorized use on non-motorized use is analyzed in the EA. All motorized use is restricted to designated roads, while non-motorized users are free to utilize the entire land mass of the Moab Field Office. There are many locations in the Moab Field Office that receive very little recreation use at all (such as the Book Cliffs). These areas are largely devoid of designated roads.
2	An additional 800 miles of route is proposed for Jeep Safari – this is too much.	Of the 782 miles of designated route proposed for use by permitted users, 152 miles would be new additions to the list of permitted routes (of the newly requested designated road miles, 46 miles are on Class B roads and 106 miles are on Class D roads). That is, 630 miles of designated route have been previously available to permitted users. There are no routes proposed for permitted use that are not already designated for motorized vehicular use.

1	The designated motorized route system is haphazard and unplanned. The Travel Plan in the RMP froze the existing motorized route system in place.	The proposed action does not concern the designation of the routes, but rather the use of these designated routes by a small subset of motorized users. The designation or closing of motorized routes to the general public is not considered in this EA.
1	The BLM should remove routes from the Jeep Safari system, especially those with conflicts with non-motorized users.	The BLM may consider the addition and removal of routes from the designated route system. The purpose and need of this EA does not include designating or closing routes. The renewal of motorized permits does not consider the “decommissioning” of designated routes, but rather allows a small subset of the motorized public to utilize the designated route.
1	Non-motorized users help the Moab economy more than do motorized users.	The EA analyzed the economic effects of the event; it also acknowledges the displacement factor of one type of group over another. Spending profiles developed over 15 years by the U.S. Forest Service as part of the National Visitation Use Monitoring Project do not support this as a general statement. Although figures can vary across regions and years, this study indicates that the lowest spending activities are non-motorized activities such as biking, hiking, primitive camping and backpacking. The commenter needs to provide specific data sources to support this assertion. See Section 4.2.1.3.
2	There should be no new routes; ORV use should not be expanded into new areas.	No new routes are created as a result of this action. All routes proposed for permitted use are designated in the 2008 RMP and are available for motorized use.
2	<p>Rusty Nail should not be added to the Jeep Safari system because it conflicts with hikers in the Gold Bar Arch area. This is not an easy route.</p> <p>Rusty Nail adds noise to a desirable hiking area.</p>	<p>The wording in the EA has been adjusted to state that while the majority of the new mileage is to offer easier routes, some new proposals are to add challenging routes. The added challenging routes are general accretions to previously permitted routes (i.e., Rusty Nail is an addition to the already very difficult Golden Spike route).</p> <p>Rusty Nail is well known already (see comment below). The nearby Gold Bar Hiking Focus Area offers hiking opportunities within the canyons draining to the Colorado River. The hiking focus area offers a destination to hikers that is devoid of designated roads. The noise of vehicles on the route is temporary and can be avoided by hiking deeper</p>



		into the canyon system.
2	A new route advertised by the Safari will have an exponential increase in usage throughout the year. An example of this explosion of usage was seen in Mill Creek when the swimming holes were advertised in books and on the internet.	<p>Jeep Safari routes that are near the town of Moab and that are challenging have become very popular with the motorized public. However, more remote Jeep Safari routes, such as Hell Roaring Rim and the Dolores Triangle, have been on the permit for decades with no appreciable increase in use. Easy routes, even near Moab, such as Copper Ridge, have also not proven particularly popular with the general public. The new routes proposed for the current Jeep Safari would not necessarily see a great increase in use just because they are listed on the permit. For examples, challenging side routes like Rusty Nail are in guidebooks and on-line already (without being a “traditional” Jeep Safari route). An internet search for “Rusty Nail Jeep” resulted in 285,000 hits; use of this route is not expected to increase merely due to its inclusion in the permit. It should be noted that the BLM does not control the content of published books nor of the Internet.</p> <p>The bulk of the newly-requested mileage is in the Hook and Ladder/Cameo Cliffs area (72 miles of the total 152 newly proposed miles). This area is managed as a motorized Special Recreation Management Area with marked routes for motorized use. The routes in Cameo Cliffs are already permitted for SRP use (San Juan ATV Safari).</p> <p>All the proposed Jeep Safari routes, including the newly-requested mileage, are designated in the 2008 Moab RMP and are available for public use at any time throughout the year.</p>
1	Where Eagles Dare is subject to cross country travel. Adding it to the Jeep Safari routes will worsen this problem.	The topography surrounding “Where Eagles Dare” is inherently confusing. The marking of the route has been recently (October 2012) improved. If this marking does not help curtail the cross country travel, the route marking will be improved again. Where Eagles Dare is not a secret, unknown route. Googling “where eagles dare jeep moab” resulted in 33,000 hits.
1	Day Canyon Point should not be added to the permit because it would conflict with hiking opportunities.	Day Canyon Point is a large area with many hiking opportunities that are not on the designated route. It should be noted that, while a designated route in the Moab Travel Plan, this route would be permitted for

		Jeep Safari only, and not for other permitted motorized users. While the purpose of this restriction is for desert bighorn sheep, it could also protect hiking opportunities along the designated road.
1	<p>The Hook and Ladder area should not be added to the permit because there is not much use there now.</p> <p>The Hook and Ladder request asks for too many routes.</p>	<p>The Hook and Ladder (Cameo Cliffs) area is designated as a Special Recreation Management Area (SRMA) devoted primarily to motorized use. A system of designated routes is contained within the SRMA. Permitted motorized users have as much right to use these routes as to non-permitted users. The Hook and Ladder routes are already permitted under the San Juan ATV Safari permit. It should be noted that several bike permittees also have the authorization to utilize the designated routes within this motorized use focus SRMA.</p> <p>The request covers all the designated routes in the Hook and Ladder area. Any one Jeep Safari run would use only a subset of these routes – generally one route up the plateau and another route down the plateau. Which routes would be chosen would depend upon the size and disposition of the Jeep Safari group.</p>
1	It would be less impacting to non-motorized users to move the Jeep Safari event to a time other than Easter. This would also help the Moab economy.	The proposed action does not dictate the time at which the Jeep Safari can occur. The permittees may consider changing Jeep Safari week if they so choose.
1	Adding new routes to the permit is expected to increase participation in the Jeep Safari	The goal of adding the new routes is to offer new options to guests (either easier or more difficult options). The new routes are not expected to increase overall participation in Jeep Safari. As noted in Table 1.1, Jeep Safari participation has decreased from 10,114 user days in 1996 to 7,236 user days in 2011.
<i>Comments Concerning Cultural Resources and NHPA Compliance</i>		
1	The commenter reports a potential archaeological site near the southern end of the Steelbender Jeep Safari route.	The Class I inventory (literature search) on the Steelbender route did not indicate any sites fitting the description given in the comment. A Class III inventory (on-the-ground) of the Steelbender route was conducted by qualified BLM archaeologists under the purview of the Moab Field Office. While several new sites were recorded during the inventory, none were recorded in the area in question.
1	The BLM has failed to comply	Consultation with SHPO and with eight affiliated

	<p>with the requirements of the NHPA to: initiate meaningful consultation with the SHPO, relevant and affected Tribes and other interested parties; determine an the area of potential effects; take the steps necessary to identify historic properties within the area of potential effects; make a good faith effort to identify cultural resources. (e.g., conduct a Class III cultural resource inventory of the area of potential effects for each route). In addition, due to the lack of information about the location of sites potentially eligible for listing on the National Register of Historic Places, the BLM's EA fails to avoid, mitigate, or minimize these effects on cultural resources.</p>	<p>tribes has been conducted on the Proposed Action. SHPO concurred with the MFO's determination of <i>'no historic properties are adversely affected'</i> and Native American consultation is complete.</p> <p>Allowing permitted activities on designated routes will not have an adverse effect on historic properties. Those sites within the existing road bed will not be affected by continuing use of the route. The BLM Handbook clearly allows for the continued use of roads. This is fully explained in the Cultural Resources portion of the Final EA (Section 1.8.3). Class III inventories are thus not required to allow continued use of existing routes.</p>
1	<p>The BLM's route designation decisions were based on inadequate information as to the density, diversity, distribution and significance of cultural resources within the Moab field office. ORV routes were designated in areas known to have high archaeological site densities but with little or no baseline inventory data.</p> <p>The BLM has done nothing since the issuance of the RMP and Travel Plan to remedy these defects in its NHPA compliance, other than survey two proposed Jeep Safari routes – Steelbender and Deadman Point. EA at 19</p>	<p>The designation of routes is not the decision to be made in this document. This proposal is for allowing permitted use of routes that are already designated through the MFO Travel Plan.</p> <p>Several cultural resource inventories have been conducted on designated motorized routes since the implementation of the RMP. These include proactive route inventories funded or completed by the BLM as well as inventories funded by specific project proponents in order to comply with Section 106 of the NHPA. The BLM admits that complete coverage of every mile of designated route has not yet been achieved.</p>
1	<p>That the proposed Jeep Safari proposal concerns "existing" or "designated" routes is irrelevant</p>	<p>The designation of routes is not the decision to be made in this document. This proposal is for allowing permitted use of routes that are already</p>

	<p>if the routes have not been surveyed for cultural resources. The BLM failed to comply with the NHPA when it designated routes during the RMP and travel planning process, and must do so when considering the Jeep Safari proposal.</p> <p>The BLM's decision to approve the Jeep Safari SRP application is an <i>undertaking</i> pursuant to the NHPA and as such, the agency must fully comply with the requirements of the NHPA.</p>	<p>designated through the MFO Travel Plan. This Travel Plan received the concurrence of SHPO during its formulation.</p> <p>The BLM agrees with the assertion that the Jeep Safari SRP application is an undertaking; the BLM has fully complied with the requirements of the NHPA in processing this application.</p>
<i>Comments Concerning Impacts of Motorized Use on Natural Resources- General</i>		
1	The EA fails to analyze and disclose the effectiveness of proposed mitigation measures, such as driving in the center of the stream channel to avoid bank and vegetation disturbance.	The applicant committed measures stated in the EA are agreed upon by the proponent in order to go beyond the mere stipulation of staying on the designated route. That is, the applicant has committed to practices such as avoiding stream banks or disturbing raptors in order to be the best possible stewards of the land. There is no requirement to disclose the effectiveness of these measures, because they exceed the basic requirement of staying strictly on the designated route.
1	The EA fails to provide an explanation of data used in analyzing potential effects to lands with wilderness character, riparian resources, water quality, wildlife, soils, air quality, cultural resources and impacts to other users.	The routes in question were designated in the 2008 RMP. The proposal is to allow permitted motorized users to drive on the routes already designated. The impact of designating the routes was disclosed in the 2008 Moab RMP and the EIS which accompanied it. Use of designated routes can be categorically excluded from NEPA analysis according to DM 516 because impacts from this type of activity are known to be non-significant.
1	The EA must include maps disclosing Jeep Safari routes in ARROW, WSAs, ACECs, wildlife habitat, riparian areas and 303(d) streams.	SUWA states that over 100 miles of requested Jeep Safari routes are within ARROW. This statement has been added to the EA in Section 2.4. The EA at Section 3.3.2 clearly states which routes are near riparian areas and 303(d) streams. There are no requested routes in WSAs, nor are there any routes designated within WSAs in the Moab Field Office. The three routes partially within ACECs (designated for travel at the time the ACEC was designated) are listed in Section 1.8.2. Wildlife

		habitats are detailed route by route in Appendix F. The EA has disclosed which routes are in the areas listed by the commenter.
1	The EA must consider an alternative that would eliminate all or some of the less popular low use routes, especially those in riparian areas, critical wildlife habitat and proposed wilderness areas if new routes are to be added to the permit.	Low use routes remain designated routes. They are open to motorized travel. The elimination of routes for public use is not under consideration in this proposal. Those routes that are designated for motorized travel may be requested for permitted use. Removing permitted travel only (which is less than 1% of total travel) would not reduce impacts (if any) that are caused by the existence and designation of these routes.
1	Do not increase the mileage available to the Jeep Safari or allow any travel in riparian areas, crucial or high value wildlife areas, areas of critical concern such as Ten Mile Canyon, areas heavily used by other recreation users, areas that are important for water resources for wildlife, or areas that have wilderness characteristics.	All routes proposed for Jeep Safari use are designated for travel in the 2008 Moab RMP. Impacts to wildlife, wilderness characteristics, non-motorized users and riparian resources are detailed in the EA. Ten Mile Canyon, while a designated route, is not proposed for permitted motorized use.
1	The Jeep Safari is concentrated high volume usage that does more damage to an area than all other usage during the year.	Monitoring of Jeep Safari use shows that permitted users stay on the designated routes. Easter in Moab, which is contemporaneous with Jeep Safari, is a very crowded period with motorized use that is not related to the Jeep Safari event. It is estimated that less than 10% of motorized use even during Easter is attributable to the Jeep Safari event. The commenter presents no evidence that more damage is done during this period than during the rest of the year. At any rate, it is logical to assume that the reported abuse is unrelated to permitted use.
1	Deadman Point should not be added to the permit because of the potential for off-route travel.	Any motorized route could lead to off-route travel. The commenter does not state why Deadman Point would be particularly prone to off-road travel. The BLM has never observed Jeep Safari participants engaging in off-route travel over many hours of monitoring. It should be noted that, while a designated route in the Moab Travel Plan, this route would be permitted for Jeep Safari only, and not for other permitted motorized users.
2	The Seven Mile Rim additions and Photographer's Run should not be	Permitted users are likely not the cause of the cross-country travel in the Seven Mile Rim area. The

	added to the permit. Off-road travel is a problem in this area; the BLM should not encourage additional use until it can manage the area properly.	BLM has exerted considerable effort in correcting cross country vehicle use in this area. Allowing permitted users on these routes could set an example of on-route travel for those that are using the Seven Mile Rim area while not under a motorized permit.
<i>Comments Concerning Impacts of Motorized Use on Natural Resources – Air Quality</i>		
1	Motorized vehicle travel on dirt roads creates dust.	Vehicles on dirt roads do create fugitive dust. The impacts from fugitive dust are intermittent and widespread over a large area and over time. For this reason, the issue was not carried forward for further analysis.
1	<p>The Jeep Safari EA fails to take a hard look at the impacts of this project on air quality as well as the cumulative impacts of this project and other polluting activities in the region on air quality. The BLM has an obligation under NEPA and FLPMA to ensure that its approval of this project does not lead to a violation of a federal air quality standard and to disclose whether such a violation is possible. The Clean Air Act (CAA) seeks to achieve its goal of providing for clean air in part by limiting increases in air pollution concentrations. The Jeep Safari EA fails to analyze the potential impacts of the Jeep Safari permit– direct, indirect and cumulative – on air quality and NAAQS. It is critical that the Jeep Safari EA consider the impacts to air quality of this proposed permit through dispersion modeling (as the BLM routinely does in other projects and committed to do in the RMP).</p> <p>SUWA is particularly concerned that the Jeep Safari EA fails to consider the</p>	<p>Motorized permitted use, including Jeep Safari, is an intermittent, temporary, and mobile source of air emissions that is highly unlikely to cause or contribute to an exceedence or violation of any National Ambient Air Quality Standards (NAAQS) for pollutants (primarily particulate) which may be emitted during the course of this activity. SUWA's contention that BLM must analyze and demonstrate through dispersion modeling that the above-stated conclusion is correct is not supported by the Clean Air Act, accepted practices in regulatory permitting and analysis, or in prior NEPA for similar types of activities. The form of the NAAQS for both PM<sub>2.5</sub> and PM<sub>10</sub> is based on the 98<sup>th</sup> percentile of the maximum 24 hour concentration averaged over 3 years. By the nature and explicit design of these standard temporary activities, and specifically impacts associated with vehicle traffic on unpaved roads, rarely if ever, are violations found related to the standard.</p> <p>The fact that BLM has conducted dispersion modeling for temporary oil and gas exploration and development projects does not mean that BLM must conduct similar modeling for every other source of emissions that may occur through BLM authorized activities. Oil and gas operations, while temporary, are also fixed point sources while operating and thus lend themselves much better to dispersion modeling. In addition, the modeling to which SUWA refers was conducted to determine potential visibility impacts to a nearby Class I area (Canyonlands National Park), rather than an expectation that the emissions could cause an</p>

	<p>impacts of this project in terms of particulate pollution: PM<sub>10</sub> and PM<sub>2.5</sub>. PM<sub>10</sub> and PM<sub>2.5</sub></p> <p>The Jeep Safari EA has not demonstrated that this proposed permit will comply with federal air quality standards, as it is required to do under the Federal Land Policy and Management Act. Please refer to SUWA's discussion of the EA's inadequate analysis of air quality.</p>	<p>exceedence or violation of the NAAQS.</p> <p>BLM bases modeling decisions on several factors: the likelihood of air quality impacts arising from the project in question, whether modeling is an accepted practice for evaluating the emissions in question, and whether the modeling can be based on sound science and adequate data. None of these criteria when applied to permitted motorized use leads to a conclusion that dispersion modeling is warranted to evaluate potential impacts from this activity.</p>
	<p>The Jeep Safari EA fails to consider the cumulative impacts of this proposal and other pollution-generating activities in the region on Air Quality. The Jeep Safari EA fails to quantify or identify preexisting and ongoing impacts. Cumulative impacts analysis clearly requires that past and present actions be included in the analysis as well. The Jeep Safari EA lacks adequate cumulative impacts analysis for air quality all of the activities taking place in the Moab Field Office. The EA fails to analyze and consider the cumulative impacts to air quality from this proposed Jeep Safari and other permitted uses of the Jeep Safari routes, as well as all other ongoing and reasonably foreseeable oil, gas and potash exploration and development, combined with other pollution-generating activities such as off-road and other motor vehicle use authorized in the Moab RMP's Travel Plan. Principal among the failings of the Moab RMP's air quality analysis is a lack of</p>	<p>In addition to the responses above, BLM also would point out that there is no monitoring data to support SUWA's contention that fugitive dust (either as PM<sub>10</sub> or PM<sub>2.5</sub>) is currently an air quality issue in the project area. Visibility monitoring conducted by the National Park Service at their IMPROVE site in Canyonlands National Park has consistently shown excellent particulate concentrations, and also has not shown any degradation in particulate concentrations since monitoring began. During this time, permitted motorized use, including the Jeep Safari, has been occurring on a regular basis.</p>

	any quantitative analysis of impacts of particulates, ozone or other criteria pollutants regulated by the Clean Air Act.	
	<p>The Moab RMP failed to undertake a cumulative impacts analysis of the air impacts of oil and gas development and motor vehicle use on routes designated in the Moab RMP. The result of this failure means that the BLM does not know whether it has authorized activities that will result in, or are now exacerbating ongoing exceedances of federal air quality standards thereby affecting public health. Accordingly, the BLM must perform dispersion modeling to accurately assess impacts to all criteria pollutants prior to issuing a decision on the Jeep Safari proposal.</p>	<p>The air quality analysis and conclusions for the Jeep Safari EA is based on consideration of this specific project, and does not rely on any air quality analysis or conclusions from the Moab RMP. Issues SUWA may have with the Moab or any other RMP are not relevant to the Jeep Safari EA.</p>
	<p>The Moab Field Office has consistently evaded cumulative impacts analysis; it is now clear that the BLM's Moab Field Office does not in fact intend to conduct site-specific quantitative analyses for site specific projects such as the Jeep Safari proposal, oil and gas, or potash exploration and development projects, or any other surface disturbing activities—and is therefore ignoring the substantial cumulative impacts of these activities on air quality. The BLM clearly has been avoiding dispersion modeling for activities in this field office. Thus, despite the fact that the Moab Field Office has ambient</p>	<p>In addition to the previous responses regarding air quality, which address most of the issues SUWA raises in this comment, an additional response regarding BLM's recognition of regional ozone issues and comprehensive modeling underway, while not explicitly relevant to the Jeep Safari, is offered. Regional ozone concentrations across southern Utah, indeed across most of the west, are an issue of concern which BLM recognizes. Monitored ozone concentrations have frequently approached the NAAQS, and many monitor locations record exceedence levels during the summer months. This occurs throughout the west, and is not an issue isolated to southern Utah. While there has been no violation of the ozone NAAQS in the project area, given the likelihood of a further tightening of the ozone NAAQS this could become an important issue for federal land managers, state government, and economic development. BLM has been and will continue to support ozone monitoring and analysis in southern Utah to help further</p>



	<p>concentrations of pollutants near NAAQS and despite the fact that the EPA specifically asked the BLM to commit to site-specific analysis of oil and gas development projects, the BLM's practice has been to completely ignore dispersion modeling for all oil, gas, and potash exploration and development activity—as well as all other pollution-generating activity such as offroad vehicle use, including organized off-road vehicle events such as the Jeep Safari—in the field office.</p> <p>The Moab Field Office must prepare a full cumulative impacts analysis making use of dispersion modeling for all NAAQS criteria pollutants before issuing a decision on the Jeep Safari EA.</p>	<p>understand this issue. To that end, BLM is conducting new ozone monitoring in Grand Staircase Escalante National Monument, and is funding a regional photochemical modeling study through the Western Regional Air Partnership (WRAP) to further the understanding of ozone formation and transport. One of the products of this study will be a look at source apportionment to better understand the contribution sources in specific locations have on overall ozone formation. BLM expects this study to be completed early in 2013, and will use the results of this study to further refine and inform our decision making process. This is exactly the type of study to which SUWA is referring to when it makes the statement that “the BLM's practice has been to completely ignore dispersion modeling for all oil, gas, and potash exploration and development activity”. We respectfully disagree.</p>
<i>Comments Concerning Impacts of Motorized Use on Natural Resources – Riparian Resources</i>		
1	NEPA requires the BLM to analyze an alternative that would eliminate routes from the permit in riparian areas.	The routes near riparian resources were analyzed and designated in the 2008 Moab RMP. The designation of routes is not under consideration in this analysis. Eliminating routes in riparian areas only from permitted motorized use, which constitutes less than 1% of total use, does not address any problems the commenter may have with riparian routes.
1	The EA fails to comply with management decisions in the RMP designed to protect scarce riparian resources.	The roads were designated in the 2008 Moab RMP and comply with management decisions in that document. Impacts to the riparian areas were disclosed in the RMP/EIS at the time of designation.
3	There should be no routes in riparian areas.	Most riparian areas near routes included in the Jeep Safari permit are not impacted by vehicular traffic. There are several riparian areas that are currently impacted by the presence of a designated route and vehicle use on it; permitted use of that designated route adds only a very small percentage to total impacts (1%). The impacts to those routes are

		<p>delineated in the EA in Section 4.2.1.2.</p> <p>All routes proposed for permitted use are designated in the 2008 RMP; the routes are currently designated for motorized travel by all users; the current proposed action would extend that approval for the very small number of motorized users that are permitted motorized users. The designation or closing of routes is not the decision to be made in this proposal.</p>
1	<p>The EA admits to problems with vehicles crossing streams as part of unmaintained routes. Vehicle use in riparian areas causes significant adverse impacts including rutting, channeling, bank deterioration, increase sedimentation and water pollution from petroleum products. Permitting vehicles in riparian areas is not consistent with Utah Riparian Policy. The EA must consider eliminating proposed routes located in riparian areas from the Jeep Safari permit.</p>	<p>Most riparian areas included in routes discussed in the present EA permit are not impacted by vehicular traffic.</p> <p>There are several riparian areas near designated routes that are currently impacted by vehicle use; permitted use would add but a small percentage to total impacts (1%).</p> <p>The Utah Riparian Policy states “The objective of the policy is to establish an aggressive riparian area management program that will identify, maintain, restore, and/or improve riparian values to achieve a healthy and productive ecological condition for maximum long-term benefits in order to provide watershed protection while still preserving quality riparian dependent aquatic and terrestrial species habitats and, as appropriate, allow for reasonable resource uses.”</p> <p>BLM is monitoring the riparian areas that are currently being impacted by all vehicular uses (permitted and non-permitted) and taking actions to reduce those impacts prior to considering any route closures as part of the travel plan evaluation.</p> <p>Closing designated routes in the travel plan per 2008 RMP is not the decision to be made in this proposal. Eliminating the small number of permitted users only would not solve any riparian problems alluded to by the commenter.</p>
1	<p>The Steelbender route (near Mill Creek) has numerous stream crossings of a perennial stream with ties to the area’s water supply. Eliminate this route.</p>	<p>The only stream crossing in the Steelbender route near Mill Creek that is impacting riparian resources is the southern crossing by Flat Pass. BLM has recently taken actions to reduce the width of this southern crossing. The Jeep Safari permit restricts vehicles to one way travel during the 10 days of Jeep Safari, further reducing the potential for route widening.</p>

		<p>This designated route is open to the public per 2008 RMP. Permitted use adds only a small percentage to total impacts (1%). In addition, were permits to be restricted, some of the permitted use might become private use.</p> <p>Closing designated routes in the travel plan per 2008 RMP is not the decision to be made in this document. This proposal is for allowing permitted use of routes that are already designated through the MFO Travel Plan.</p>
2	Mill Creek is on the State of Utah Division of Water Quality's 303(d) impaired list for high temperatures.	<p>Mill Creek was identified as impaired based on sampling done in 1997-1998. The TMDL was completed in 2002. Since then, BLM has taken measures to improve riparian conditions in Mill Creek, including closing travel routes at the Powerdam area, ensuring that required stream flow passes through the Sheley Diversion, reducing social trailing and caging cottonwoods to protect them from beavers. Monitoring is ongoing at the Flat Pass stream crossing to evaluate road impacts. Fencing has been undertaken at the Flat Pass crossing, and other restrictions are under consideration to reduce the route width. Other actions will be considered and undertaken to reduce the impacts at this site.</p> <p>This designated route is open to the public per 2008 RMP. Permitted use adds only a small percentage to total impacts (1%).</p> <p>Closing designated routes in the travel plan per 2008 RMP is not the decision to be made in this document. The EA discusses Mill Creek and Steelbender and their relationship to the 303(d) list in Section 1.8.7.</p>
1	The EA fails to ensure that the proposed permit will not violate the federal Clean Water Act by further degrading the water quality of the 303(d) listed streams.	<p>Mill Creek was designated by the State of Utah as impaired due to high stream temperatures and Total Dissolved Solids. Stream temperatures may be lower with improved riparian conditions and stream shading, along with increased stream flow. This proposed project would add an estimated 1% additional impacts to the riparian resources in Mill Creek from the Steel Bender Trail, mainly at the southern stream crossing which is widening and removing riparian vegetation. All uses in Mill</p>

		<p>Creek, including hiking and horse trails, are managed with the objective of reducing impacts to the riparian resources. Grazing has been eliminated in Mill Creek Canyon per the 2008 Moab RMP. Overall impacts to the riparian resources have been reduced since 2002 when the Mill Creek TMDL was completed. Ongoing restoration actions are underway to further reduce impacts to riparian resources, including physically limiting the width of the southern Steel Bender stream crossing.</p> <p>BLM has recently taken additional actions to reduce the width of the southern stream crossing in Mill Creek. The Jeep Safari restricts vehicles to one way travel, further reducing the potential for route widening and associated water quality degradation in Mill Creek.</p> <p>Since the TMDL was published in 2002, BLM has taken actions to address water quality impairment status in Mill Creek. These include completion of the Mill Creek Management Plan, closing several travel routes in the Powerdam area, removing grazing from the canyon and its uplands, minimizing social trailing in the canyon, and fencing at the Flat Pass stream crossing to reduce the route width.</p>
1	<p>The TMDL report on Mill Creek recommends that riparian shading be increased. Shading cannot be increased where Steelbender crosses Mill Creek (4 times – three times on the northern end and once on the southern end).</p>	<p>Since the publication of the TMDL in 2002, BLM has taken measures to improve riparian conditions in Mill Creek, including closing travel routes at the Powerdam area, ensuring that required stream flow passes through the Sheley Diversion, reducing social trailing and caging cottonwoods to protect from beavers. Monitoring is ongoing at the Flat Pass stream crossing to evaluate road impacts. Fencing and other restrictions are planned at the Flat Pass crossing to reduce the route width. Other actions will be considered and undertaken to reduce the impacts at this site.</p> <p>The only stream crossing in the Steelbender route near Mill Creek that is impacting riparian resources is the southern crossing by Flat Pass. BLM has recently taken actions to reduce the width of this crossing. The Jeep Safari permit requires one way use of this route during the 10 days of Jeep Safari,</p>

		<p>further reducing the potential for route widening.</p> <p>This designated route is open to the public per the 2008 RMP. Permitted use adds a small percentage to total impacts (1%).</p>
1	<p>The southern crossing of Steelbender is particularly degraded and is widening because vehicle are crossing at various angles and off-road. This very likely causes high sediment loading.</p>	<p>Monitoring is ongoing at the Flat Pass stream crossing to evaluate road impacts. Fencing and other restrictions are planned at the Flat Pass crossing to reduce the route width. Other actions will be considered and undertaken to reduce the impacts at this site.</p> <p>This designated route is open to the public per 2008 RMP. Permitted use adds a small percentage to total impacts (1%). The EA discloses that the southern crossing of Mill Creek on the Steelbender route is degraded. The degradation of this crossing, however, is due to southbound traffic, and not to northbound traffic. The Jeep Safari only uses Steelbender in a northbound direction (it is a one way route for the length of the Safari). The BLM has recently installed pipe structures to help constrain the widening of the crossing.</p>
1	<p>Only extensive restoration and site hardening could mitigate the impact of the Steelbender route. It would be cheaper and more ecologically sound to close the route to motor vehicles.</p>	<p>BLM has recently taken actions to reduce the width of the stream crossing near Flat Pass. The Jeep Safari permit restricts vehicles to one way travel for the 10 days of the Safari, further reducing the potential for route widening.</p> <p>Monitoring is ongoing at the Flat Pass stream crossing to evaluate road impacts from all vehicle use.</p> <p>This designated route is open to the public per 2008 RMP. Permitted use adds a small percentage to total impacts (1%).</p> <p>The designation or closing of the Steelbender route is not the decision to be made in this document. This proposal is for allowing permitted use of routes that are already designated through the MFO Travel Plan.</p>
1	<p>Kane Creek has suffered vehicular abuse, as well as overgrazing. Kane Creek should not be permitted for any</p>	<p>Monitoring is ongoing in Kane Creek to evaluate road impacts from all vehicle use.</p> <p>This designated route is open to the public per 2008</p>

	motorized event, and should be closed to all motor vehicle use except in emergencies.	<p>RMP. Permitted use adds a small percentage to total impacts (1%). Closing designated routes in the travel plan per 2008 RMP is not the decision to be made in this proposal.</p> <p>The Jeep Safari permit restricts vehicles to one way travel during the 10 days of the event, reducing the potential for route widening. The Jeep Safari permit also requires the Red Rock 4Wheelers to mark the route in Kane Creek before Jeep Safari week to reduce multiple routes within the riparian area in Kane Creek. The designation or closing of routes is not the decision to be made. This proposal is for allowing permitted use of routes that are already designated through the MFO Travel Plan. Grazing is also outside the scope of this analysis.</p>
1	Tenmile Canyon should not be permitted for any motorized use, and should be closed to motor vehicles except in emergencies.	Although designated for vehicular travel, Tenmile Canyon is not on the list of requested permitted routes. The designation or closing of routes is not the decision to be made in this analysis.
1	If the BLM wishes not to punish the Red Rock 4-Wheelers, who are law-abiding, it can allow Kane Creek, Steelbender and Tenmile Canyon to be used ONLY (sic) by the Jeep Safari.	Although allowing only permitted use on a route is an interested proposal, the closing of routes to the general public is not under consideration in this EA. This proposal is for allowing permitted use of routes that are already designated through the MFO Travel Plan.
<i>Comments Related to the Management of Mill Creek</i>		
1	The Mill Creek area received special attention in the 2008 RMP, including making it an ACEC, requiring development of a watershed management plan, prohibiting camping, and removing grazing. While Steelbender was explicitly allowed in the 2008 RMP, it is incompatible with the other goals in the area.	As the commenter notes, Steelbender was explicitly allowed in the 2008 RMP, and was seen to be compatible with the other goals in the area. It may be true that the route designation requires a balance with the other goals in the area.
1	We ask that BLM not allow any permitted use of Steelbender. We ask the BLM to improve the watershed and to rehabilitate Mill Creek and the Steelbender	This designated route is open to the public per 2008 RMP. Permitted use adds only this small percentage (less than 1%) to any impacts that may ensue from driving on this route. During the 10 days of Jeep Safari, all traffic on Steelbender is one way. This

	route.	<p>helps to minimize impacts to Mill Creek because the problematic southern crossing of Mill Creek does not receive damage going south to north. In addition, route widening is less likely to occur when all vehicles are traveling in the same direction.</p> <p>See responses above concerning restoration work in Mill Creek. The BLM will continue to make efforts to rehabilitate Mill Creek, such as ensuring the water supply to the creek after it passes the Sheley Diversion near Flat Pass.</p>
<i>Comments Concerning Unlawful Motorized Activity</i>		
1	Increased levels of unlawful activities have occurred on BLM property eve(ry) year of the Jeep Safari. The BLM does not have the staff to protect the resource from users that cut fences, make race tracks, or go across county. The BLM needs to limit the size of the Jeep Safari to only an area that can be patrolled by BLM personnel at least once each day.	Discussion with BLM Law Enforcement indicates that unlawful activities during Easter have actually decreased in recent years. There has never been a reported incident of fence cutting, race track creation or cross country use by Jeep Safari participants. The BLM acknowledges that not all motorized users are as law-abiding; the issuance of Special Recreation Permits to motorized groups is intended to promote responsible motorized use, since all permitted users are required to abide by the stipulations attached to the permit.
1	Where Jeep Safari goes, irresponsible users follow and create hill climbs and travel cross country off the designated route.	The proposed action is to permit authorized users on a subset of routes designated in the 2008 RMP. The activity described by the commenter is illegal. The proposed action does not analyze illegal activity by the general public on designated routes.
<i>Comments Offering Corrections to the EA</i>		
1	Maps accompanying the EA show a road going into Canyonlands National Park just north of Rustler Canyon. Is this road designated in the Park?	This road is not designated in the National Park, and is not permitted for Jeep Safari use. The BLM thanks the commenter for pointing this out. The map accompanying the EA has been corrected.
<i>Other Comments Concerning the Issuance of the Permit</i>		
1	A ten year permit term is too long. Five years should be maximum time of the permit.	Federal regulations at 43 CFR 2930 allow for the issuance of a ten year special recreation permit. A permit may be terminated at any time by the BLM should a permittee fail to comply with the regulations. In addition, should routes be removed from the Travel Plan, they would also be removed from any Special Recreation Permits allowing use of that route. The BLM sees no reason to issue a shorter term permit to a permittee who has held an SRP for over 18 years.

APPENDIX H  
SHPO Concurrence Letter





## United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Moab Field Office 2012 OCT 29 PM 12:53  
82 East Dogwood  
Moab, Utah 84532



<http://www.blm.gov/ut/st/en/fo/moab.html>

### CONCURRENCE

September 19, 2012

In Reply Refer To: **DOI-BLM-UT-Y010-2011-0189 EA**

CERTIFIED MAIL RETURN RECEIPT REQUESTED  
Certification No: 7011 1150 0000 0359 9200

Lori Hunsaker  
State Historic Preservation Officer  
Utah State Historical Society  
300 Rio Grande  
Salt Lake City, Utah 84101-1182

### **Part I: Project Description**

**County:** Grand and San Juan

**Project Name:** Red Rock 4 Wheelin' Jeep Safari Environmental Assessment

The Moab Field Office (MFO) is currently in the process of writing an Environmental Assessment (EA) for the annual Jeep Safari event. In the past this EA has been used as the basis for permitting other full sized vehicle Special Recreation Permits (SRPs) within the MFO. However, SRPs are discretionary and can be modified by the BLM should any situation arise which would warrant such an effort.

The EA is specifically being written to allow permitting on 887 miles of routes. These routes are not entirely on BLM lands and the proponent would be responsible for securing the appropriate permits from the responsible land manager where prudent. The EA is currently analyzing a 10 year term for the permit. Two of the routes are in the northernmost portion of the Monticello Field Office.

The permits are issued to commercial guides or other organized groups. Permits also include standard stipulations related to inadvertent discoveries and protection of archaeological resources.

As the issuance of SRPs is a discretionary undertaking and due to the sensitive nature of motorized use of public lands in southern Utah this undertaking:

	(1) is a non-routine interstate and/or interagency project or program
	(2) directly affects a National Register eligible or listed property
X	(3) has been determined by BLM, the SHPO or the Council to be highly controversial
	(4) is one of the following: a land exchange, land sale, Recreation and Public Purpose lease, or transfer
X	(5) is one which we wish to bring to your attention

## Part II: Determination of Effect

I have determined that **no historic properties will be adversely affected** as a result of commercial usage of open roads for the following reasons:

- All permitted activities would occur on roads designated open in the 2008 Moab Field Office Travel and Resource Management Plan (RMP).
- SHPO concurred with the BLM's recommendation of No Adverse Effect related to the implementation of the proposed RMP prior to implementation.
- The MFO is continuing to meet the commitments regarding travel management and cultural resources as outlined in the 2008 RMP.
- Use of roads without changing the character of its surface is not considered a ground disturbing activity per Federal and State BLM guidance. (National Handbook 8100, BLM Utah Handbook 8110, Utah Handbook 8120)
- The Field Office RMP allows for continued use of designated routes.
- Cumulative commercial activity represents less than 2% of total usage of the road system.

I seek your concurrence that **no historic properties are adversely affected** with this undertaking and the associated SRPs that will likely be permitted as a result. After your review of this letter and the associated materials please return to us a copy with your comments.

Thank you for your time and consideration.

Bureau of Land Management, Moab Field Office

Aron C. King

September 20, 2012

Field Office Archaeologist

Date



10/16/12

Field Office Manager

Date

Utah State Historic Preservation Officer

  
By

Concur

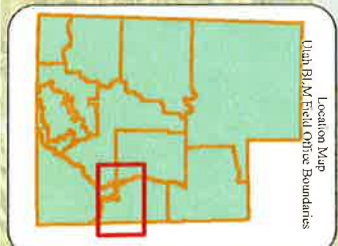
Do Not Concur

10.24.12

Date

Comments:

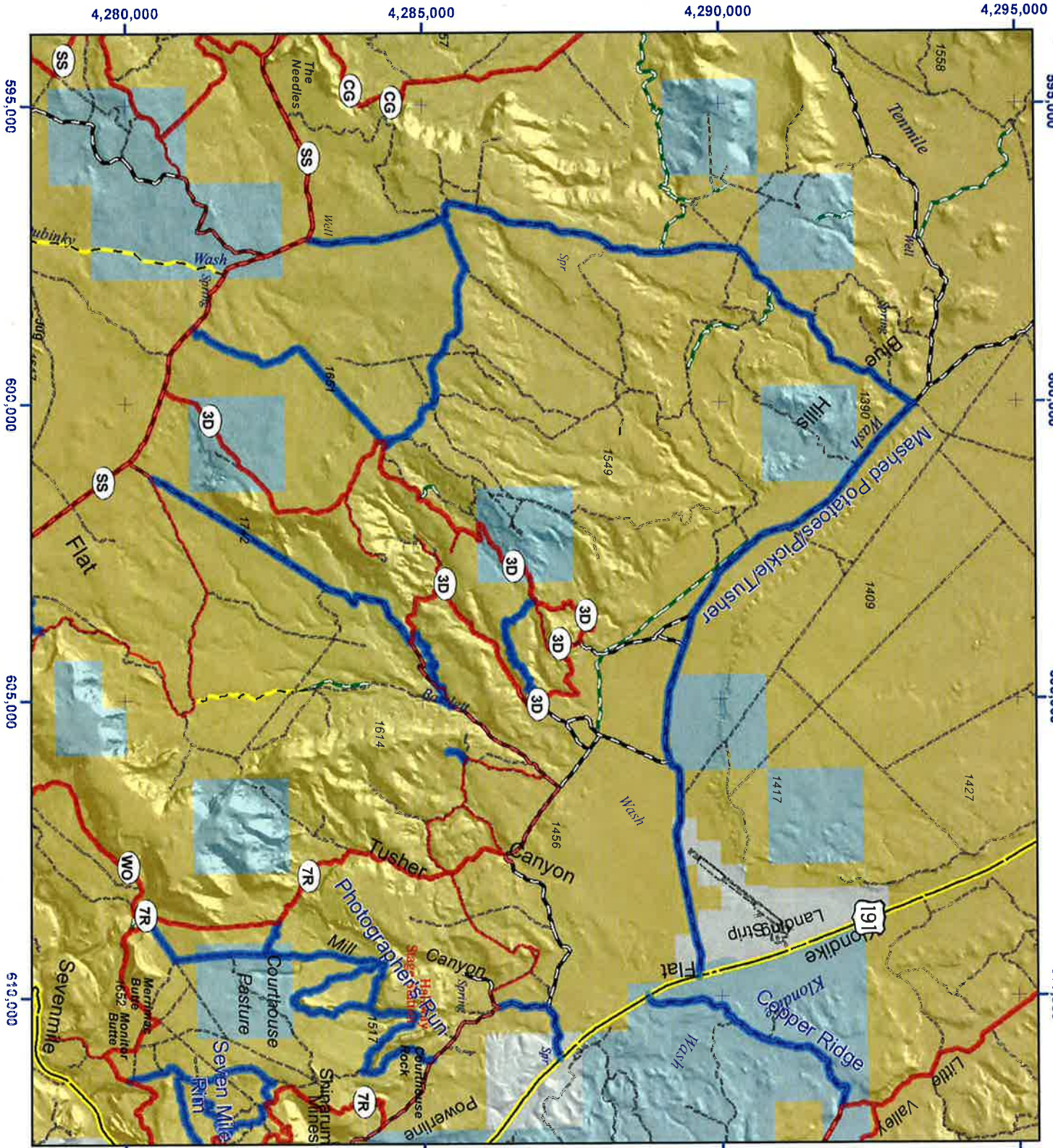








Map 2a. Mashed Potatoes/Pickle/Tusher Proposed Addition to 3D Jeep Safari Route



DOI-BLM-Y010-2011-0189 EA

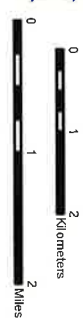
Bureau of Land Management  
Moab Field Office



- Mashed Potatoes/Pickle/Tusher
- Proposed Addition to 3D
- Alternate Jeep Safari Routes
- Previously Authorized
- Main Jeep Trail Routes
- Previously Authorized
- State and Federal Highways
- B Roads (Maintained)
- D Roads (Unmaintained)
- ATV and Motorcycle Routes
- Motorcycle Routes (No ATVs)

**Land Status**

- Bureau of Land Management
- State
- Private
- 3D = 3D Route
- 7R = Seven Mile Rim Route
- CG = Crystal Geyser Route
- SS = Secret Spire Route
- WO = Wipeout Hill Route



Location Map  
Utah BLM Field Office Boundaries



Date: 10/23/2012

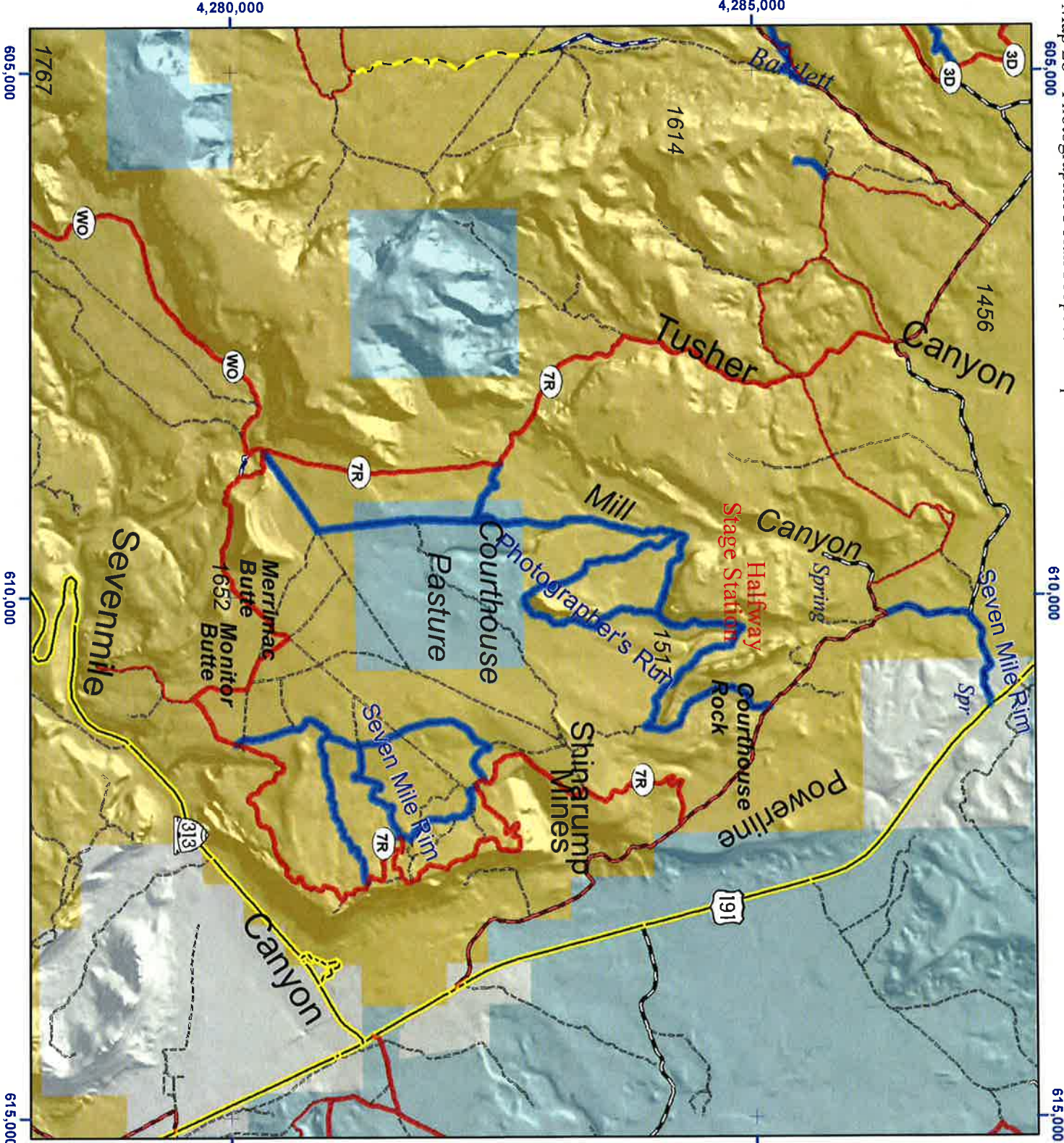
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Grid: UTM Zone 12 NAD83





Map 2b - Photographer's Run Proposed Jeep Safari Route



DOI-BLM-Y010-2011-0189 EA  
Bureau of Land Management  
Moab Field Office



- Photographers Run
  - Proposed Route
  - Alternate Jeep Safari Routes
  - Previously Authorized
  - Main Jeep Trail Routes
  - Previously Authorized
  - State and Federal Highways
  - B Roads (Maintained)
  - D Roads (Unmaintained)
  - ATV and Motorcycle Routes
  - Motorcycle Routes (No ATVs)
- Land Status**
- Bureau of Land Management
  - State
  - Private
  - 3D = 3D Route
  - 7R = Seven Mile Rim Route
  - WO = Wipeout Hill Route
- 0 0.5 1 Kilometers  
0 0.5 1 Miles
- N  
W  
E  
S



Date: 10/23/2012

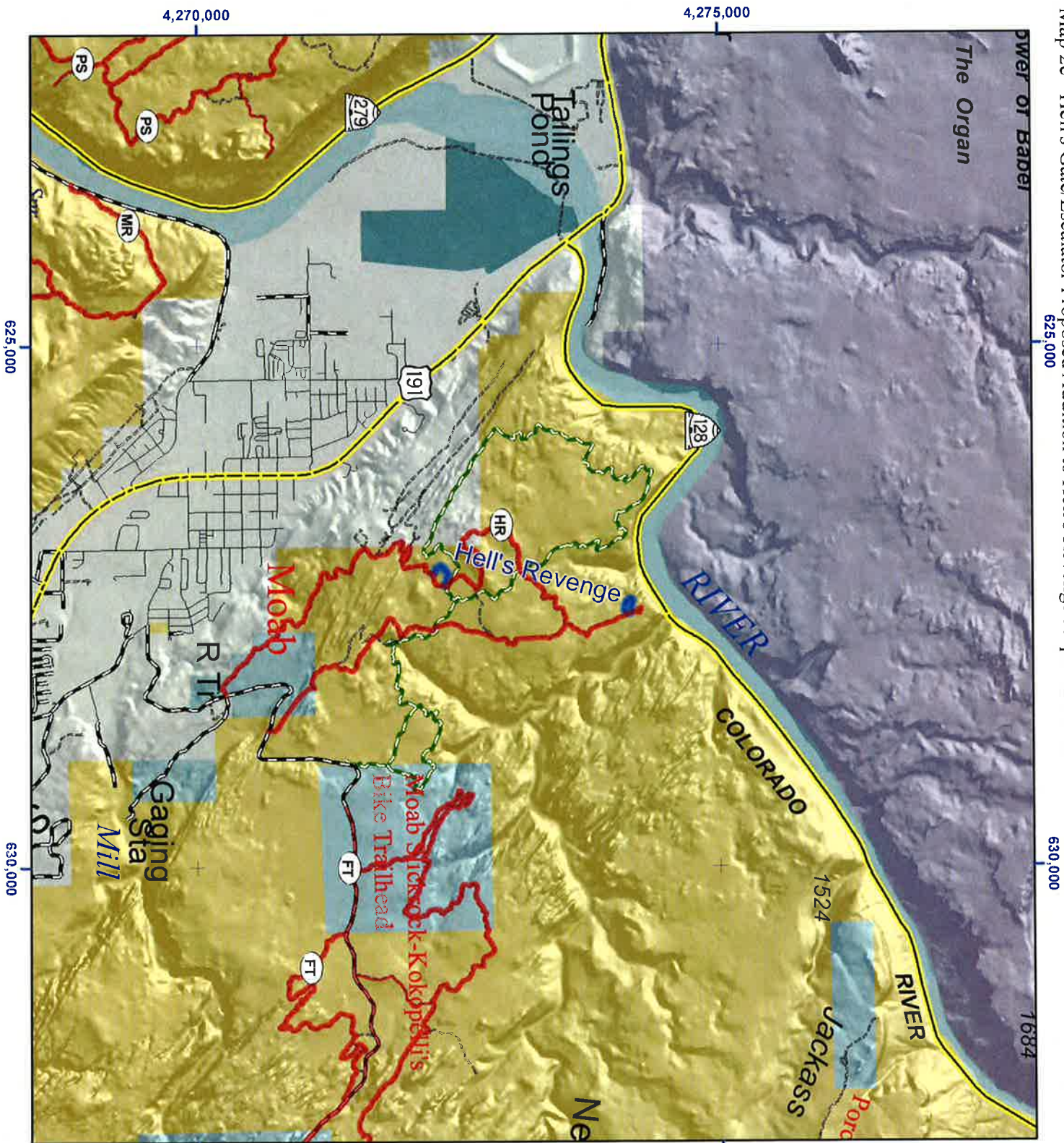
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Grid: UTM Zone 12 NAD83

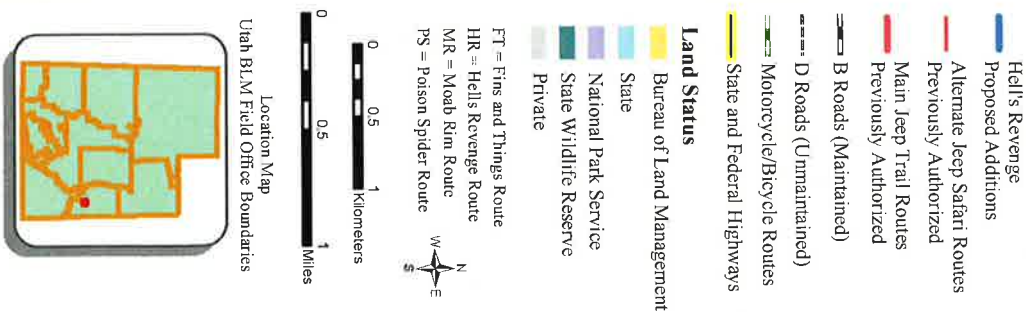




Map 2c - Hell's Gate/Escalator Proposed Addition to Hell's Revenge Jeep Safari Route



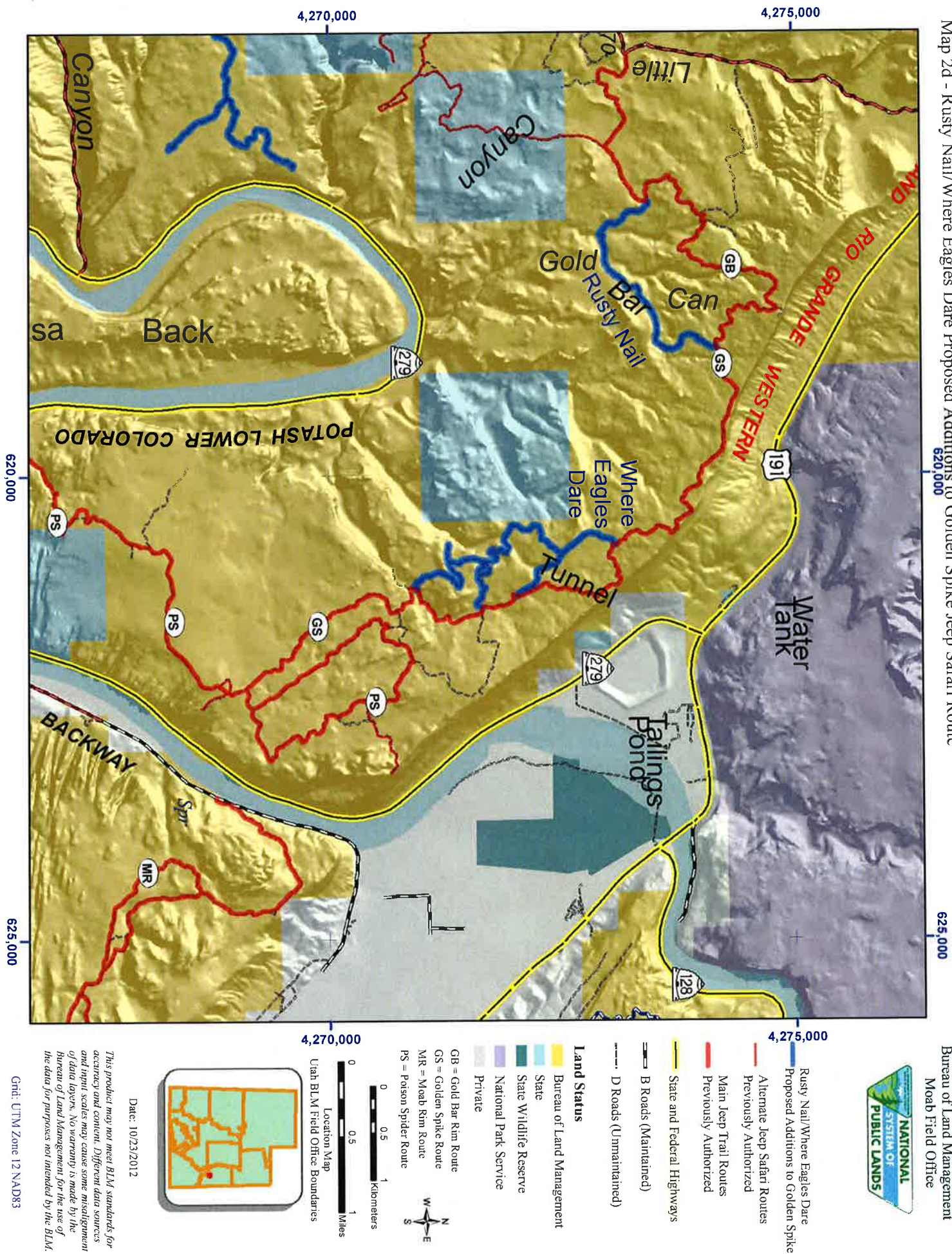
DOI-BLM-Y010-2011-0189 EA  
Bureau of Land Management  
Moab Field Office



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Map 2d - Rusty Nail/Where Eagles Dare Proposed Additions to Golden Spike Jeep Safari Route  
520,000

### Rusty Nail/Where Eagles Dare Proposed Additions to Golden Spike

Alternate Jeep Safari Routes  
Previously Authorized

**Main Jeep Trail Routes**  
Previously Authorized

## — State and Federal Highways

- B Roads (Maintained)
- D Roads (Unmaintained)

## and Status

B = Gold Bar Rim Route  
S = Golden Spike Route  
R = Moab Rim Route  
SS = Poison Spider Route



Location Map  
Utah BLM Field Office Boundaries



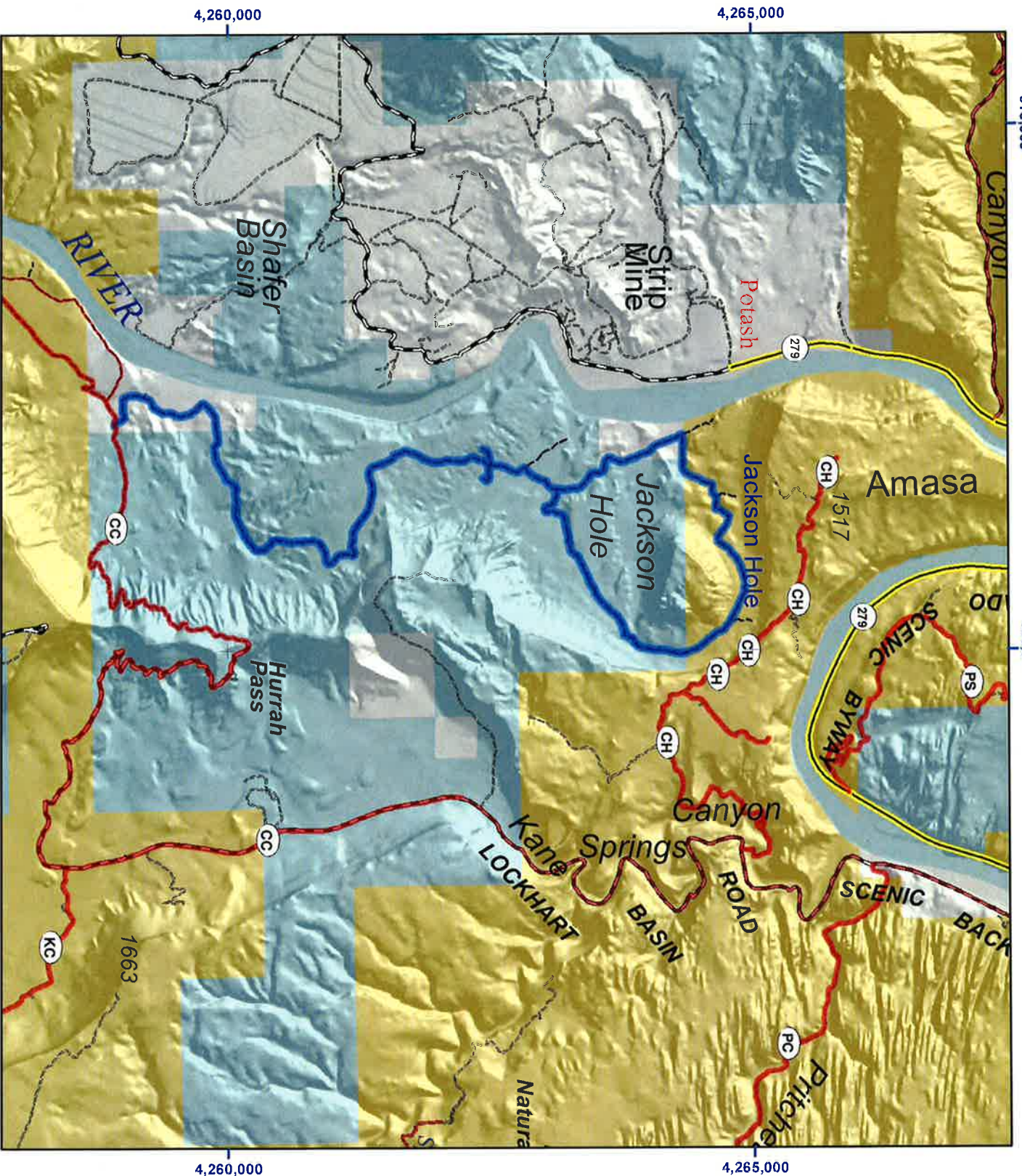
Date: 10/23/2012

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Map 2e - Jackson Hole Proposed Addition to Chicken Corners Jeep Safari Route



DOI-BLM-Y010-2011-0189 EA  
Bureau of Land Management  
Moab Field Office



Date: 10/23/2012

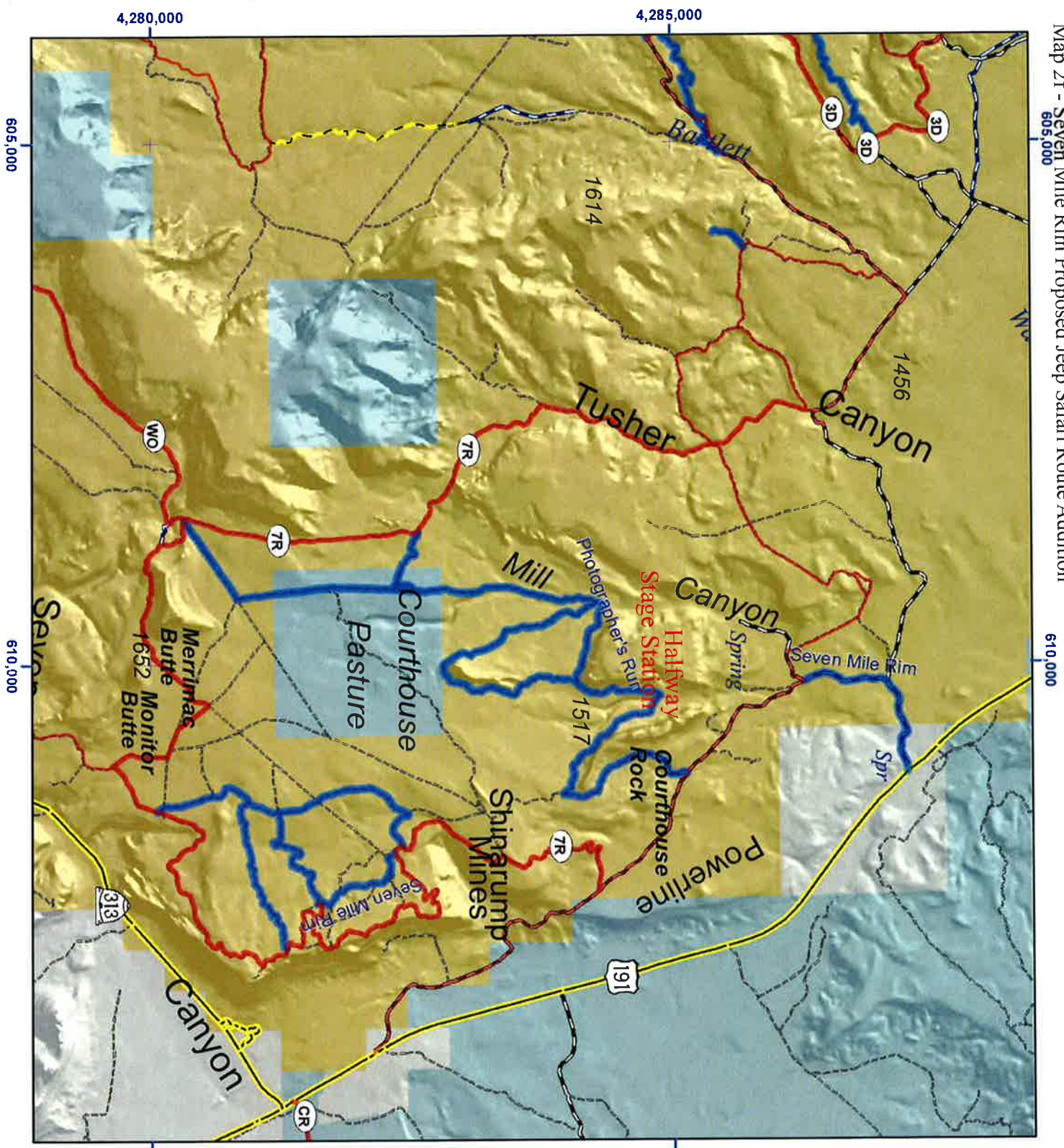
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Grid: UTM Zone 12 NAD83





Map 2f - Seven Mile Rim Proposed Jeep Safari Route Addition



DOI-BLM-Y010-2011-0189 EA  
Bureau of Land Management  
Moab Field Office

- Sevenmile Rim
  - Proposed Addition
  - Alternate Jeep Safari Routes
  - Previously Authorized
  - Main Jeep Trail Routes
  - Previously Authorized
  - State and Federal Highways
  - B Roads (Maintained)
  - D Roads (Unmaintained)
  - ATV and Motorcycle Routes
  - Motorcycle/Bicycle Routes
- Land Status**
- Bureau of Land Management
  - State
  - Private
- 3D = 3D Route  
7R = Seven Mile Rim Route  
CR = Copper Ridge Route  
WO = Wipeout Hill Route
- 0 0.5 1 Miles

0 0.5 1 Kilometers



Location Map  
Utah BLM Field Office Boundaries

Date: 10/23/2012

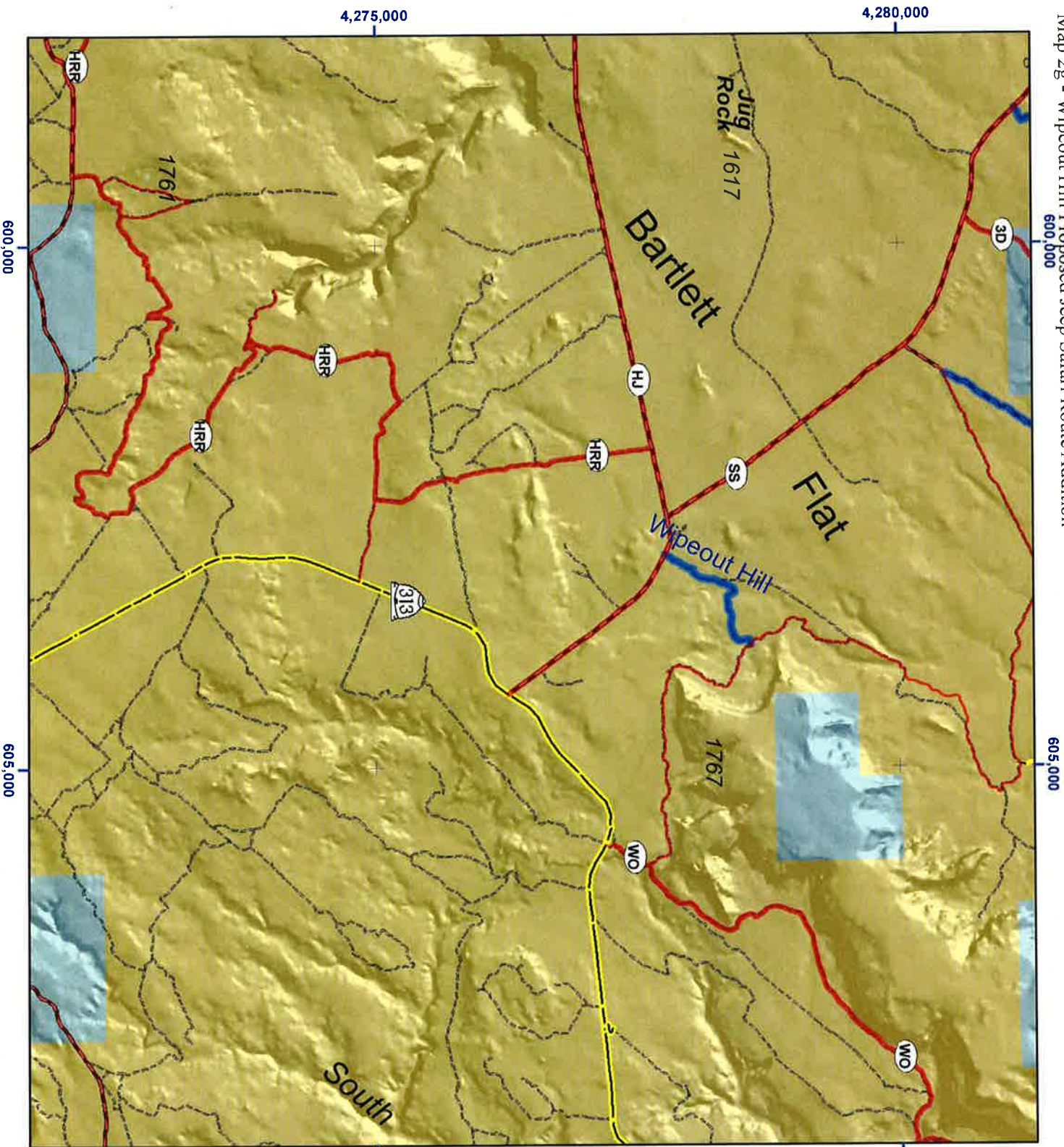
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Grid: UTM Zone 12 NAD83

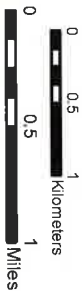




Map 2g - Wipeout Hill Proposed Jeep Safari Route Addition



- Wipeout Hill
  - Proposed Addition
  - Alternate Jeep Safari Routes
  - Previously Authorized
  - Main Jeep Trail Routes
  - Previously Authorized
  - State and Federal Highways
  - B Roads (Maintained)
  - D Roads (Unmaintained)
- Land Status**
- Bureau of Land Management
  - State
- 3D = 3D Route  
HJ = Hey Joe Canyon Route  
HRR = Hell Roaring Rim Route  
SS = Secret Spire Route  
WO = Wipeout Hill Route



Location Map  
Utah BLM Field Office Boundaries



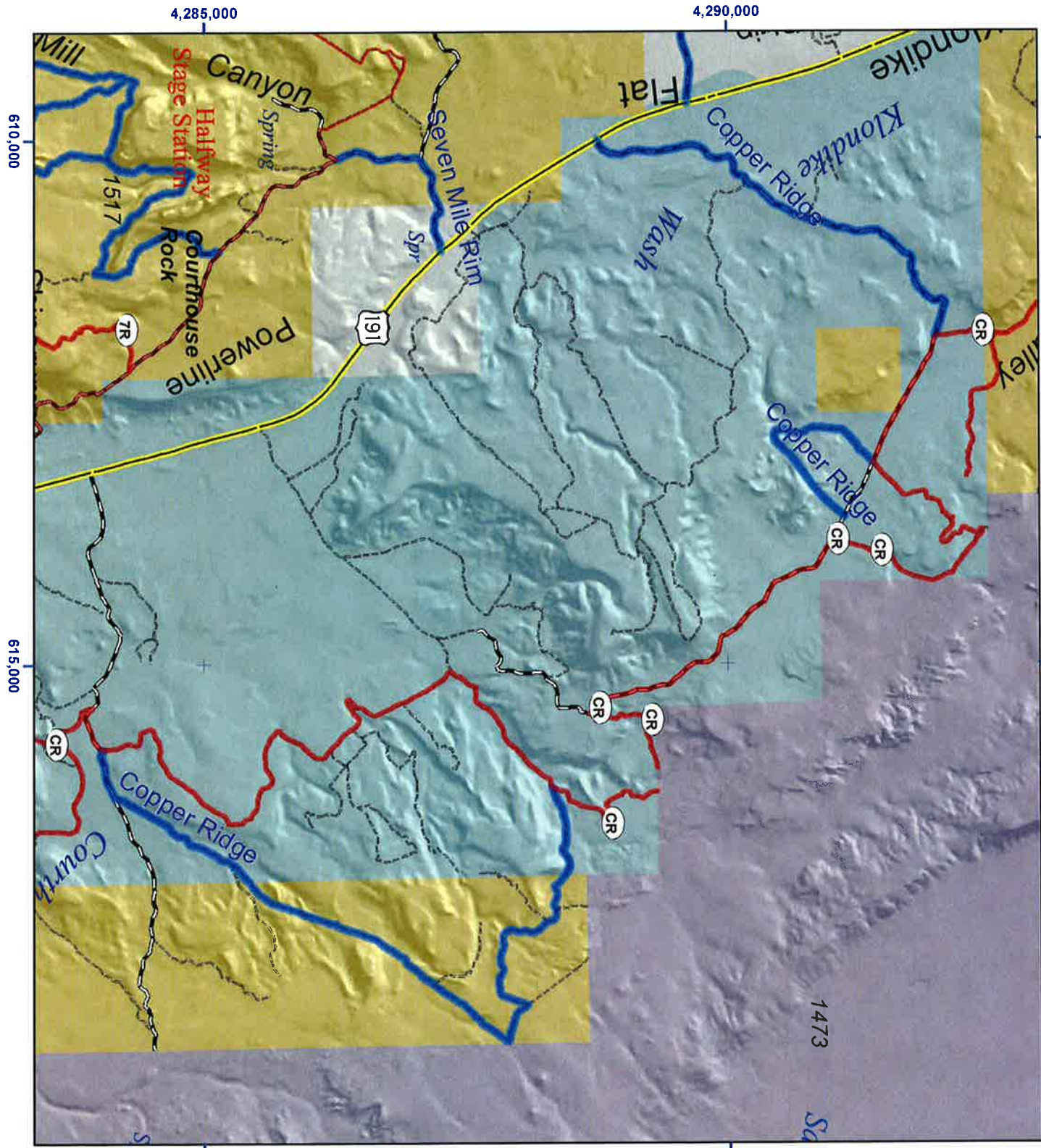
Date: 10/23/2012

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Map 2h - Copper Ridge Proposed Jeep Safari Route Additions



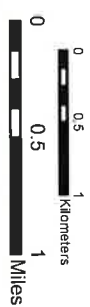
DOI-BLM-Y010-2011-0189 EA  
Bureau of Land Management  
Moab Field Office

- Copper Ridge Proposed Additions
- Alternate Jeep Safari Routes
- Previously Authorized
- Main Jeep Trail Routes
- Previously Authorized
- State and Federal Highways
- B Roads (Maintained)
- D Roads (Unmaintained)

**Land Status**

- Bureau of Land Management
- State
- National Park Service
- Private

CR = Copper Ridge Route  
7R = Seven Mile Rim Route



Location Map  
Utah BLM Field Office Boundaries



Date: 10/23/2012

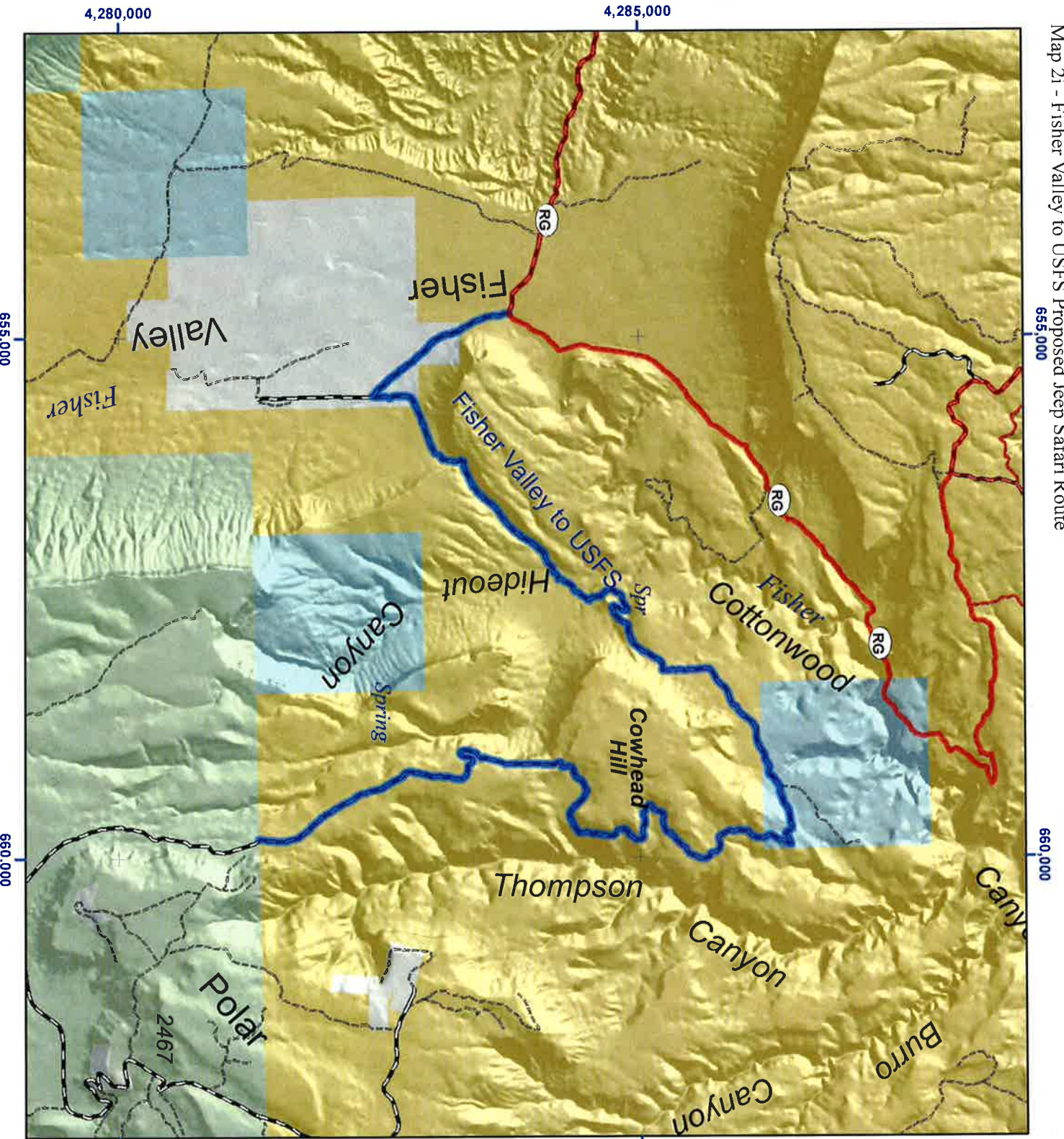
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Gnd: UTM Zone 12 NAD83





Map 2i - Fisher Valley to USFS Proposed Jeep Safari Route



- Polar Mesa Proposed Routes
  - Alternate Jeep Safari Routes
  - Previously Authorized
  - Main Jeep Trail Routes
  - Previously Authorized
  - State and Federal Highways
  - B Roads (Maintained)
  - D Roads (Unmaintained)
- Land Status**
- Bureau of Land Management
  - State
  - Private
  - US Forest Service
- RG = Rose Garden Hill Route
- 0 0.5 1 Kilometers  
0 0.5 1 Miles
- W N  
S E



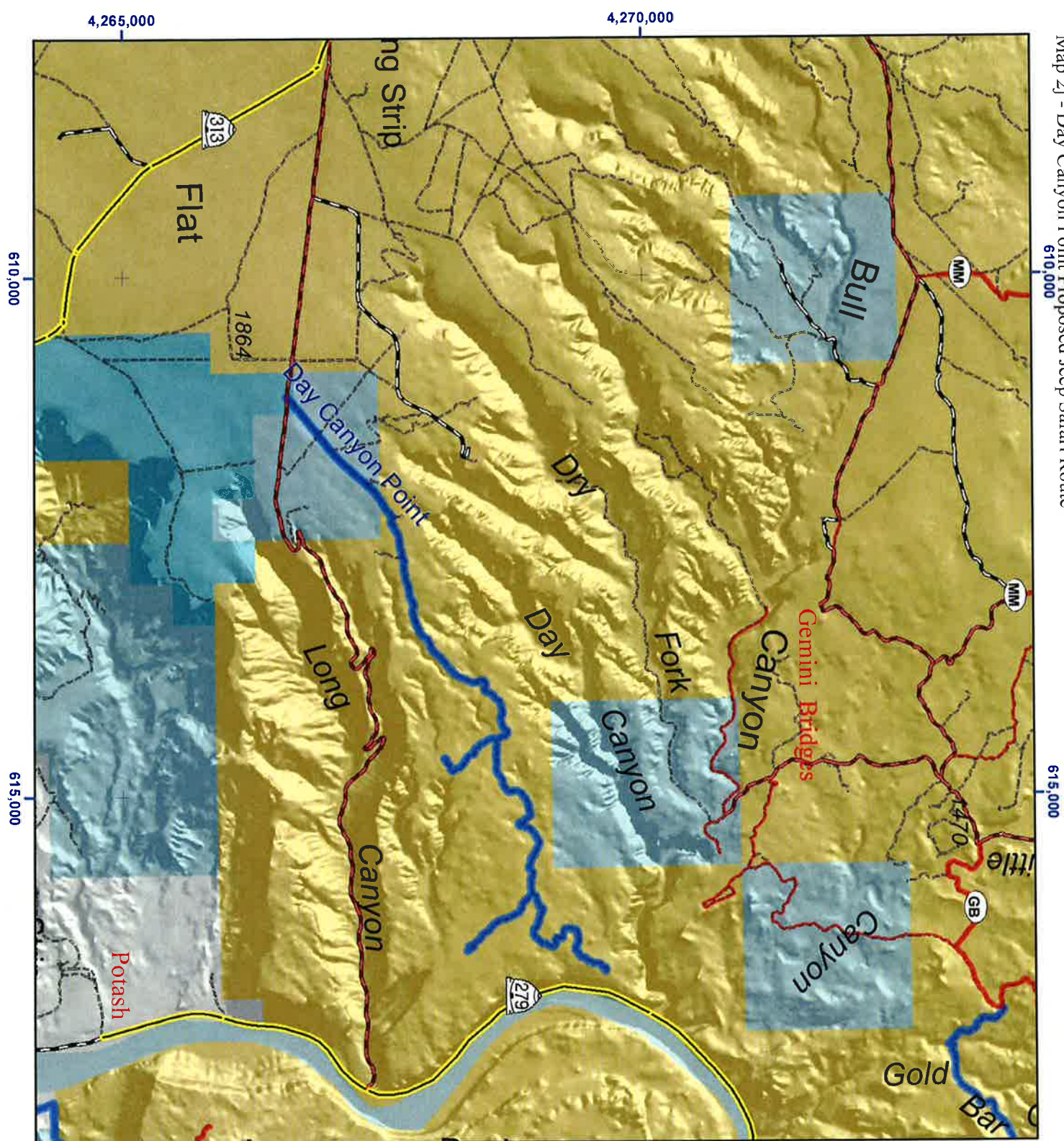
Date: 10/23/2012

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Map 2j - Day Canyon Point Proposed Jeep Safari Route

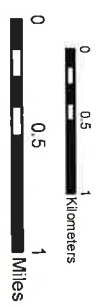


DOI-BLM-Y010-2011-0189 EA  
Bureau of Land Management  
Moab Field Office

- Day Canyon Point Proposed Route
- Alternate Jeep Safari Routes
- Previously Authorized
- Main Jeep Trail Routes
- Previously Authorized
- State and Federal Highways
- B Roads (Maintained)
- D Roads (Unmaintained)

- Land Status**
- Bureau of Land Management
  - State
  - State Park
  - Private

GB = Gold Bar Rim Route  
MM = Metal Masher Route



Location Map  
Utah BLM Field Office Boundaries



Date: 10/23/2012

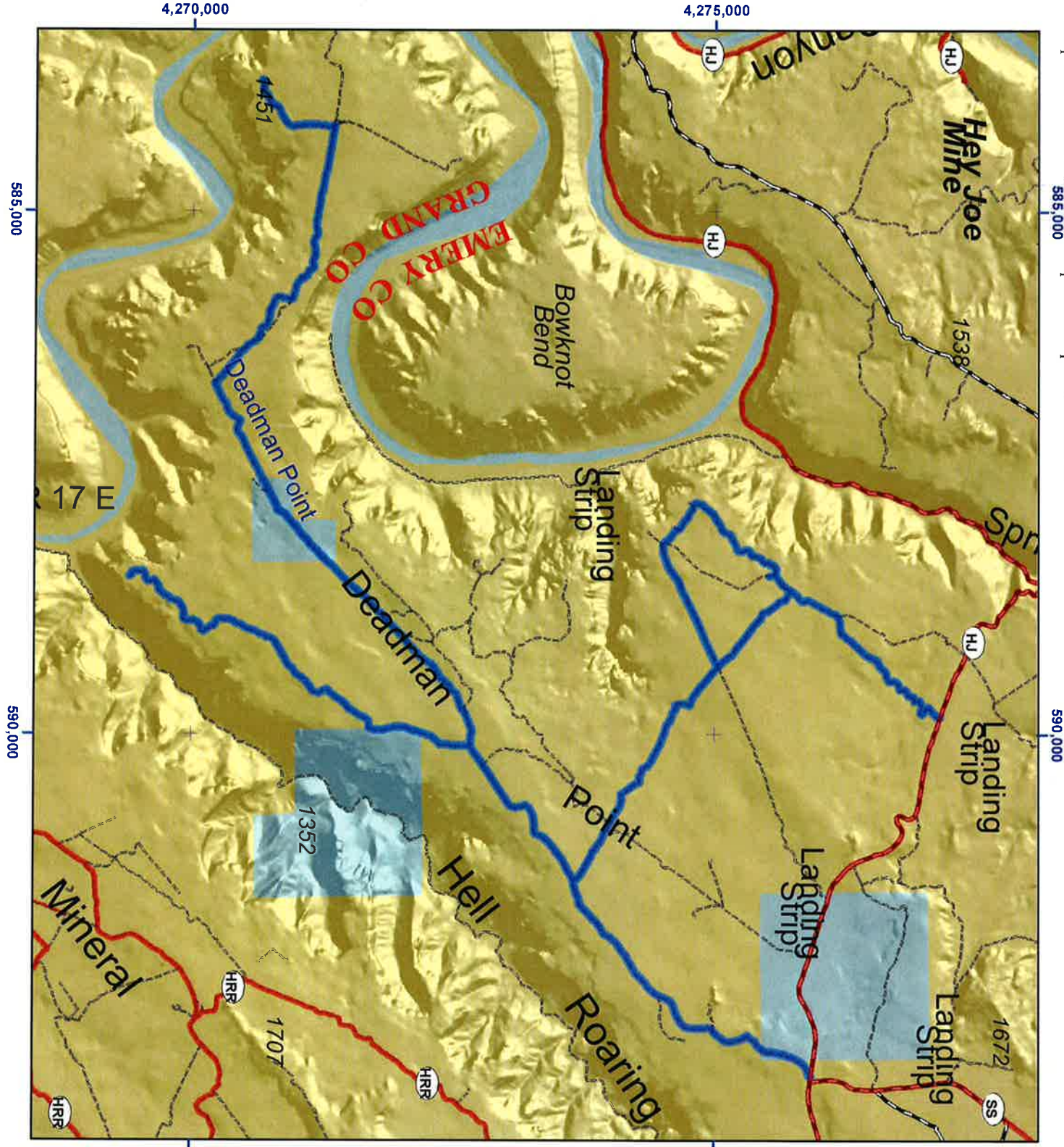
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Grid: UTM Zone 12 NAD83





Map 2k - Deadman Point Proposed Jeep Safari Route



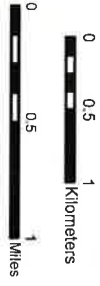
DOI-BLM-Y010-2011-0189 EA  
Bureau of Land Management  
Moab Field Office

- Deadman Point
- Proposed Route
- Alternate Jeep Safari Routes
- Previously Authorized
- Main Jeep Trail Routes
- Previously Authorized
- State and Federal Highways
- B Roads (Maintained)
- D Roads (Unmaintained)

**Land Status**

- Bureau of Land Management
- State

HJ = Hey Joe Canyon Route  
HRR = Hell Roaring Rim Route  
SS = Secret Spire Route



Utah BLM Field Office Boundaries



Date: 10/23/2012

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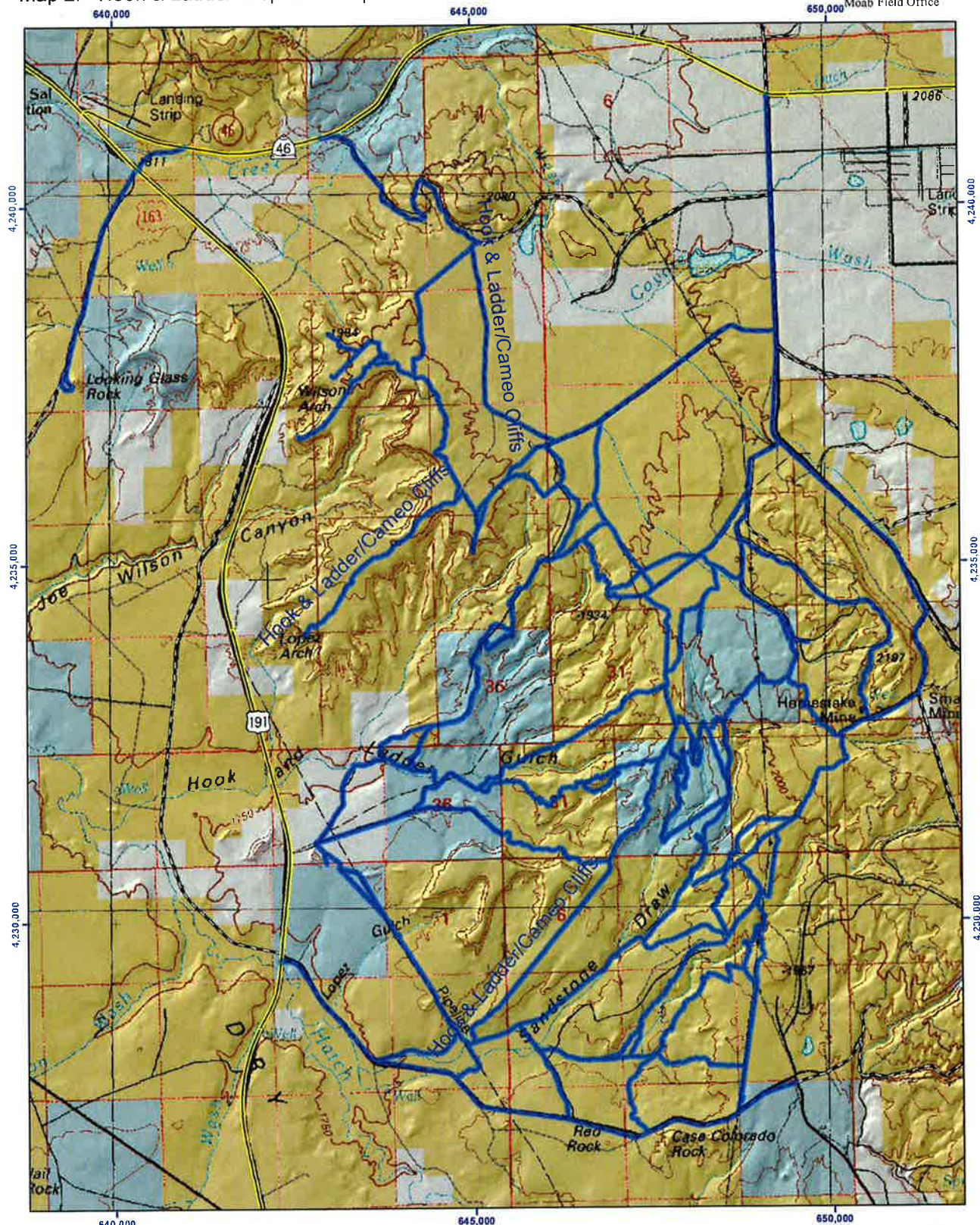
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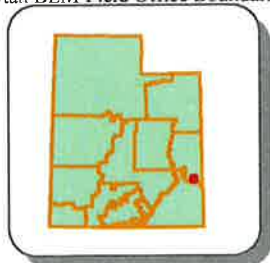


# Map 21 - Hook & Ladder Proposed Jeep Safari Routes

DOI-BLM-Y010-2011-0189 EA  
Bureau of Land Management  
Moab Field Office



Location Map  
Utah BLM Field Office Boundaries



Date: 10/23/2012

Hook & Ladder Proposed Routes

State and Federal Highways

B Roads (Maintained)

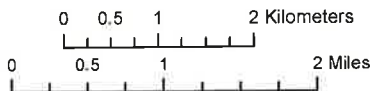
D Roads (Unmaintained)

Land Status

Bureau of Land Management

State

Private



This product may not meet BLM standards for accuracy and content. Different data sources and input scales may cause some misalignment of data layers. No warranty is made by the Bureau of Land Management for the use of the data for purposes not intended by the BLM.

Grid: UTM Zone 12 NAD83

